



AEP ANADOLU ETAP PENKON GIDA VE TARIM ÜRÜNLERİ SANAYİ VE TİCARET ANONİM ŞİRKETİ

GENERAL POLICY WITH RESPECT TO THE PROCESSING AND PROTECTION OF PERSONAL DATA

1. PURPOSE AND SCOPE

AEP Anadolu Etap Penkon Gıda ve Tarım Ürünleri Sanayi ve Ticaret Anonim Şirketi (the “**Company**”) shows the maximum effort to comply with all applicable legislation with respect to the processing and protection of personal data.

Within the frame of the General Policy With Respect to the Processing and Protection of Personal Data of AEP Anadolu Etap Penkon Gıda ve Tarım Ürünleri Sanayi ve Ticaret Anonim Şirketi (the “**Policy**”), the principles adopted in the performance of personal data processing activities by the Company are set forth.

With the Policy, the sustainability of the “principle of performance of the Company’s activities in a transparent manner” is targeted. Within this scope, the essential principles adopted for the compliance of the Company’s data processing activities with the regulations provided in the Law No. 6698 on the Protection of Personal Data (the “**Law**”) are identified and the practices carried out by the Company are introduced.

The Policy is intended for real persons whose personal data are processed by the Company automatically or otherwise with non-automatic methods provided that they are a part of a data recording system and the about the protection of the personal data of the Company’s employees are separately regulated in the “**Policy With Respect to the Processing and Protection of Personal Data of the Employees of AEP Anadolu Etap Penkon Gıda ve Tarım Ürünleri Sanayi ve Ticaret Anonim Şirketi**”.

2. PRINCIPLES OF THE POLICY

The Policy is published in the websites of the Company (www.anadoluetap.com, www.meyvedenseker.com and www.doalmeyve.com) in an accessible manner by the data subjects. In parallel with any amendments and improvements to be made in the applicable legislation, the amendments to be made on the Policy shall be make available so that the data subjects can easily access thereto.

In case of a conflict between the applicable legislation regarding the protection and processing of personal data and this Policy, the Company agrees that the legislation in force shall be applied.

3. DEFINITIONS

Explicit Consent:	A consent which is related to a specific issue, based on information and declared by free will.
Anonymization:	Making personal data impossible to be associated with an identified or identifiable real person even by way of matching with other data.
Personal Data:	All kinds of information about an identified or identifiable real person.
Data Subject:	A real person whose personal data are processed (<i>i.e.</i> customers and employees).
Processing of Personal Data:	All kinds of transactions on the personal data such as collection, recording, storing, retention, , alteration, re-organization, disclosure, transferring, taking over, making accessible, classifying or preventing the use of the same through fully or partially automatic or otherwise non-automatic methods provided that they are a part of any data recording system.
Law:	The Law No. 6698 on the Protection of Personal Data dated 24.03.2016 as published in the Official Gazette dated 07.04.2016 and numbered 29677.
The Board:	Personal Data Protection Board.
The Authority	Personal Data Protection Authority.
Special Categories of Personal Data:	Any data related to race, ethnical origin, political opinion, philosophical belief, religion, sect or other believes, clothing and appearances, membership in foundations, associations or unions, health, sexual life, criminal conviction and security measures as well as biometric and genetic data.
Policy:	General Policy With Respect to the Processing and Protection of Personal Data of AEP Anadolu Etap Penkon Gıda ve Tarım Ürünleri Sanayi ve Ticaret Anonim Şirketi.
Company:	AEP Anadolu Etap Penkon Gıda ve Tarım Ürünleri Sanayi ve Ticaret Anonim Şirketi.
Business Partners:	The parties with whom the Company establishes a business partnership for various purposes at the time of carrying out its business activities.
Supplier:	The parties who provide services to the Company based on an agreement.
Customer:	The parties to whom the Company provides products and services.
Anadolu Group Companies/Group Companies:	The companies included in the structure of AG ANADOLU GRUBU HOLDİNG A.Ş.
Data Processor:	The real and legal person who processes any personal data based on the authorization granted by the data controller.
Data Controller:	The person who identifies the purposes and methods of personal data processing and managing the system where the data are kept systematically.

4. DATA SUBJECT GROUPS WITHIN THE SCOPE OF THE POLICY

Data subjects (data subject groups) who are included in the scope of the Policy and whose personal data are processed by the Company are as follows:

- **Employee Candidates**
The persons who have not executed an employment agreement with the Company yet but are included in the evaluation process of the Company for such execution.
- **Customers, Suppliers, Business Partners and Their Authorized Officers and Employees**
Real person authorized officers, shareholders and employees of the organizations with which the Company has a business relationship.
- **Website and Corporate Network Visitors**
Visitors of the Company's corporate web pages and visitors of the corporate network.
- **Office Visitors / Fair and Event Participants**
Real persons who visit the offices, facilities and farms of the Company or the websites operated by the Company.
- **Non-continuous Day Wage Agricultural Workers**
Agricultural workers who are working in the farms of the Company based on a Labour Contract for Agricultural Mediation.
- **Family Members of Non-continuous Day Wage Agricultural Workers**
Children of our agricultural workers who are working in the farms of the Company based on a Labour Contract for Agricultural Mediation between the ages of 4-15.
- **Family Members of the Employees**
Family members of the Company's employees.
- **Other Real Persons**
All real persons who are not included in the scope of the Policy With Respect to the Protection and Processing of Personal Data of the Employees of AEP Anadolu Etap Penkon Gıda ve Tarım Ürünleri Sanayi ve Ticaret Anonim Şirketi.

5. FINALIZATION OF THE REQUESTS OF DATA SUBJECTS

In the event that the Data Subjects submit to our Company their requests about their personal data in writing, the Company carries out the required processes in the capacity of the data controller in order to finalize the request within the shortest period of time possible and within thirty (30) days at the latest depending on the nature of the request.

The Company may request information in order to identify whether the applicant is the data subject of the personal data related to the application in order to ensure data security. Furthermore, our Company may direct questions to the data subject with respect to his application for the purpose of finalizing the application of the data subject in compliance with the request.

In the event that the application of the data subject is likely to prevent any rights and freedom of others, it requires a disproportional effort or that the data are publicly available, the request shall be able to be rejected by the Company with the explanation of the justification thereof.

5.1 Rights of the Data Subject



According to article 11 of the Law, you can apply to our Company and make a request in the following issues:

- (1) To learn whether your personal data are processed or not,
- (2) To request information if your personal data are processed,
- (3) To learn the purpose of processing of your personal data and whether these are used for the intended purpose thereof,
- (4) To get information about any third parties to whom your personal data are transferred in Turkey or abroad,
- (5) To ask for the correction of your personal data in the event that they are processed incompletely or incorrectly and request the notification of the transaction performed within this scope to any third parties to whom your personal data are transferred,
- (6) To request the deletion, destruction or anonymization of your personal data in case that the reasons for processing disappear although they are processed in compliance with the Law and other provisions of applicable laws and request the notification of the transaction performed within this scope to any third parties to whom your personal data are transferred,
- (7) To object against an outcome to your disadvantage as a result of the analysis of your processed data exclusively through automatic systems,
- (8) To ask for an indemnification if you incur a loss as a result of unlawful processing of your personal data.

5.2 Situations Beyond the Scope of Rights of the Data Subjects under the Legislation

It shall not be possible for the data subjects to claim their rights in the following issues on the grounds that the following issues are not included in the scope of the Law pursuant to article 28 thereof:

- (1) Processing of personal data for the purposes of art, history, literature or science or within the scope of freedom of expression provided that it does not breach national defence, national security, public safety, public order, economic safety, right to privacy or personal rights or that it does not constitute a crime.
- (2) Processing of personal data for such purposes as research, planning and statistics by way of anonymization through official statistics.
- (3) Processing of personal data within the scope of preventive, protective and informative activities carried out by governmental agencies and bodies which are appointed and authorized by law for ensuring national defence, national security, public safety, public order or economic safety.
- (4) Processing of personal data by judicial authorities or enforcement bodies with respect to investigation, proceeding, litigation or enforcement procedures.

It shall be not be possible for the data subjects to claim their rights excluding the right to request indemnification of any incurred loss in the following situations as per article 28/2 of the Law:

- (1) Necessity of personal data processing for the prevention of a crime or for a criminal investigation.
- (2) Processing of personal data which are made available to public by the data subject himself.
- (3) Necessity of personal data processing for the performance of auditing or regulating duties and a disciplinary investigation or proceeding by appointed and authorized governmental

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authorities and bodies as well as professional organizations in the nature of a governmental agency based on the authorization granted by the Law.

- (4) Necessity of personal data processing for the protection of economic and financial interests of the Government with respect to budget, tax and financial issues.

6. ENSURING THE SECURITY AND CONFIDENTIALITY OF PERSONAL DATA

All kinds of required measures are taken by the Company depending on the nature of the data to be protected within the bounds of possibility in order to prevent unlawful disclosure of, access to and transfer of personal data or any security gaps which may occur in other ways.

Within the scope, the Company takes all kinds of required (i) administrative and (ii) technical measures, (iii) an auditing system is established within the structure of the Company and (iv) the measures stipulated in the Law are followed in case of unlawful disclosure of personal data.

(1) Administrative measures taken by the Company to ensure lawful personal data processing and prevent unlawful access to personal data

- Employees are trained and their awareness within the scope of personal data protection is raised for the fulfilment of the obligations of the Company as the data controller,
- In the event that personal data are transferred, the Company includes the required arrangements for the persons to whom personal data are transferred and the agreements concluded by the Company and commitments of the parties in terms of confidentiality and lawful processing are received,
- Personal data processing activities carried out by the Company are examined in detail and within this framework, the actions required to be taken for ensuring compliance with the personal data processing requirements stipulated in the Law are identified,
- Employees are authorized in the Company for access to personal data and any files and folders containing personal data are kept in the cupboards and/or archives of relevant units under lock and key and in an inaccessible manner by unauthorized persons,
- Anadolu Etap Personal Data Protection Committee has been established in the Company as a working group for the purpose of ensuring and maintaining compliance with the legislation on personal data protection.

(2) Technical measures taken by the Company to ensure lawful personal data processing and prevent unlawful access to personal data

- Such policies and procedures of the Company as Quality and Information Security, Access Control, Clear Desk and Clear Screen, Communication Security, Use of Information Systems etc. as intended for ensuring data security are also in force and the Company has ISO 27001 certificate,
- Any risks, threats, gaps and weaknesses related to the information systems of the Company are revealed by means of performing/causing the performance of internal network, external network and social engineering penetration tests and the required precautions are taken accordingly for the purpose of storing personal data in compliance with the applicable legislation and our Company's policies on personal data protection and ensuring cyber security,

- Firewalls and antivirus programs have already been installed in the computers available in the Company. The logs in the electronic media in which personal data are stored are regularly recorded,
- Critical systems are backed up on a daily basis,
- The electronic media in which data are stored are protected with high security encryption methods and the passwords are regularly changed,
- Monitoring activity is performed with the help of the surveillance cameras in office buildings.

(3) Measures to be taken in case of unlawful seizure, disclosure or breach of personal data

In the event that personal data are unlawfully seized by unauthorized persons within the scope of personal data processing activity carried out by the Company, this situation is notified to the Contact Person and Committee without delay. Upon the notification of such breach, the Contact Person notifies the Board in the shortest period of time possible. The Company has a Data Breach Response Plan in place which is prepared for these purposes and in compliance with the applicable legislation.

7. DESIGNATION OF THE UNIT RESPONSIBLE FOR THE PROTECTION AND PROCESSING OF PERSONAL DATA

“Anadolu Etap Personal Data Protection Committee” which will undertake the required coordination in the Company has been established by the Company to ensure and maintain compliance with the applicable legislation on the protection of personal data. The Committee is responsible for functioning and improving the systems installed for securing uniformity between the units of the Company and ensuring compliance of the activities performed with the applicable legislation on the protection of personal data.

Within this scope, essential duties of the Committee are set forth below:

- To decide the method of implementing and supervising the policies and procedures with respect to the protection and processing of personal data and make internal appointments and ensure coordination within this framework,
- To identify the actions required to be taken to comply with the applicable Law and legislation, supervise the implementation thereof and ensure its coordination,
- To determine the risks which may take place in the personal data processing activities of the Company and make improvement recommendations,
- To design and ensure the provision of trainings for the protection of personal data and implementation of the policies,
- To manage the process of providing responses to the applications of data subjects,
- To follow the developments and regulations in terms of personal data protection as well as the resolutions of the Board, make recommendations to the top management about the actions to be taken for the operations of the Company in compliance with these developments and resolutions,
- To manage the relationships with the Board and the Authority,

- To fulfil other duties to be entrusted by the management of the Company for the protection of personal data.

8. DATA SUBJECTS WHOSE DATA ARE PROCESSED BY THE COMPANY, DATA CATEGORIES AND OTHER INFORMATION ON THE PERSONAL DATA PROCESSING

8.1. Employee Candidates

The Company processes the personal data of employee candidates who are contacted with or evaluated by the Company for the purpose of work placement usually as described below:

8.1.1 Categories of the Processed Data

Some examples of the data about the employee candidates as processed by the Company are provided below and these examples are not in a limited number:

- Identity information (name, surname, mother's name, father's name, date of birth, place of birth, nationality, marital status, any personal data shown on the ID card, photograph),
- Contact details (residential address, mobile phone number, e-mail address),
- Information on business experiences (educational background, business experiences, certificates and trainings),
- CVs and resumes,
- Criminal conviction (the data provided in a criminal record obtained from candidates for ensuring the security of the workplace and employees),
- Health data (blood type, disability data for some positions, chronic or infectious diseases, health report etc.).

8.1.2 Purpose and Legal Processing Conditions of Personal Data Processing

The abovementioned personal data categories are usually processed for the purposes below:

- To evaluate job applications, skills, qualifications and areas of interest of candidates in accordance with the career opportunities of the Company,
- To make a job offer to a candidate at the end of the evaluation period and perform the human resources operations of the Company in case that the job offer is accepted,
- To ensure communication about existing and/or future career opportunities of the Company if a candidate is not offered the job or the job offer is not accepted by such candidate.

The legal processing conditions on which these activities are based are as follows:

- The necessity of processing personal data belonging to parties of an agreement provided that such processing activity is directly related to the establishment or fulfilment of the agreement,
- The obligation of processing personal data for legitimate interest of the data controller on condition of not prejudicing to the fundamental rights and freedoms of the data subject,
- Obtaining of the explicit consent of the data subject, if required.

8.1.3 To Whom the Personal Data May Be Transferred

The Company may transfer the abovementioned personal data to the following persons or institutions in compliance with article 8 of the Law concerning domestic data transfer.

Within this scope, personal data of employee candidates are transferred, if required, to:

- Governmental and administrative institutions and courts,
- Accounting and payroll service providers, private employment offices, human resources, labour law and social security consultancy firms,
- Travel agencies and hotels in order to be able to organize travel and accommodation needs of any candidates who are coming from another city or country,
- AG Anadolu Grubu Holding A.Ş. for executive recruitments.

The Company may transfer the abovementioned personal data to the following persons in compliance with article 9 of the Law concerning data transfer abroad. Within this framework:

- Certain personal data belonging to employee candidates are transferred to the supplier firm acting as our service provider in America for the purpose of the general ability test and personality inventory.

8.1.4 Retention Periods

The Company retains the abovementioned personal data for the periods shown in the Table of Retention and Destruction Periods as attached to the Personal Data Retention and Destruction Policy and destructs the same on an ex officio basis upon the disappearance of the reasons for the processing of such data.

Accordingly, any personal data belonging to employee candidates are retained for 2 years starting from the date of recording in the event that an employment relationship is not established.

8.2 Office Visitors/Fair and Event Participants

The Company generally processes the personal data of fair and event participants and office visitors as detailed below.

8.2.1 Categories of the Processed Data

The Company generally processes the following personal data in this group in a categoric manner:

- Identity information (name, surname Turkish ID number),
- Corporate identity data if a business card is left (title, position in the company, trade name of the company),
- Contact details (mobile phone number),
- Physical environmental safety data (entrance-exit records, surveillance camera images),

- Health data of the visitors of our production facilities (whether they have an allergic reaction and data on infectious diseases).

8.2.2 Purpose and Legal Processing Condition of Personal Data Protection

The Company processes the abovementioned personal data of office visitors for the following purposes and in accordance with the legal processing conditions of “the obligation of processing personal data for legitimate interest of the data controller on condition of not prejudicing to the fundamental rights and freedoms of the data subject” and “obtaining of the explicit consent of the data subject, if required”:

- To take technical and administrative measures to ensure the safety of life and property in office facilities,
- To ensure food safety, performance of the Company’s activities in compliance with the applicable legislation and assure compliance with product safety and health,
- To keep the records of the visitors of office facilities for security purposes.

The Company processes the abovementioned personal data of fair visitors, on the other hand, for the following purpose and in accordance with the legal processing condition of “the obligation of processing personal data for legitimate interest of the data controller on condition of not prejudicing to the fundamental rights and freedoms of the data subject”:

- To communicate with visitors and assess any probable commercial relationship potential,
- To give information to visitors about products, services and events.

8.2.3 To Whom the Personal Data May Be Transferred

The abovementioned personal data may be transferred to the persons or institutions provided below in compliance with article 8 of the Law on domestic data transfer.

Within this scope, general personal data belonging to office visitors are transferred to administrative officers and officials of the Police Department upon request whereas the personal data belonging to fair and event visitors are transferred to cargo and distribution firms, if required.

8.2.4 Retention Periods

The Company retains the abovementioned personal data for the periods shown in the Table of Retention and Destruction Periods as attached to the Personal Data Retention and Destruction Policy and destructs the same on an ex officio basis upon the disappearance of the reasons for the processing of such data.

Accordingly, the surveillance camera images related to office visitors are retained for 30 days following the date of recording and the personal data available in the visitor’s book are retained for 2 years and the personal data belonging to fair and event participants are retained for 2 years starting from the recording date.

8.3 Suppliers, Their Employees, Authorized Officers and Potential Suppliers



They refer to real and legal persons who provide all kinds of goods and services to the Company as well as their employees and authorized officers.

8.3.1 Categories of the Processed Data

The Company generally processes the following personal data in this group in a categoric manner:

- Identity information (name, surname, place of birth, date of birth, Turkish ID number),
- Contact details (address, telephone number and e-mail address of real company partners and authorized officers for legal entity suppliers),
- Finance and supplier transaction data (taxpayer ID number, bank account details, tax office, IBAN number),
- Corporate identity data (title, position in the company, trade name of the company),
- Physical environmental safety data (office entrance-exit records)
- Car location data (GPS).

8.3.2 Purpose and Legal Processing Condition of Personal Data Processing

The abovementioned personal data categories are generally used for the following purposes:

- To manage relationships with suppliers,
- To establish relationships with suppliers, execute an agreement and manage the supply relationship,
- To monitor finance and accounting transactions,
- To enhance security in our farms and facilities,
- To record the persons who are not yet included in the supplier portfolio and make contact with the Company for the first time as potential suppliers and to improve the supplier portfolio,
- To perform a security inquiry before VPN connection, carry out verification and achieve connection,
- To plan and perform logistics activities.

The legal processing conditions on which these activities are based are as follows:

- The necessity of processing personal data belonging to parties of an agreement provided that such processing activity is directly related to the establishment or fulfilment of the agreement,
- The obligation of processing personal data for the fulfilment of the legal liability of the Data Controller,
- The obligation of processing personal data for the establishment, exercise or protection of a right,
- The obligation of processing personal data for legitimate interest of the data controller on condition of not prejudicing to the fundamental rights and freedoms of the data subject,
- Obtaining of the explicit consent of the data subject, if required.

8.3.3 To Whom the Personal Data May Be Transferred

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The Company may transfer the abovementioned personal data to the following persons or institutions according to article 8 of the Law on domestic data transfer:

- Auditing firms, legal advisers, relevant institutions and authorities in case of a legal process, courts, execution offices, customs directorates, Social Security Institution and AG Anadolu Grubu Holding A.Ş.

The Company may further transfer data to the following persons or institutions in some cases in compliance with article 9 of the Law concerning data transfer abroad:

- Our customers in various countries for the purpose of shipment to our customers abroad, if required,
- The locations abroad due to the fact that the servers of our information systems and solutions are located abroad.

8.3.4 Retention Periods

The Company retains the abovementioned personal data for the periods shown in the Table of Retention and Destruction Periods as attached to the Personal Data Retention and Destruction Policy and destructs the same on an ex officio basis upon the disappearance of the reasons for the processing of such data.

Accordingly, the abovementioned personal data belonging to employees and authorized officers of our real and legal entity suppliers are retained for 11 years starting from the last commercial relationship record with the supplier and for 2 years in case that a supply relationship is not established.

8.4 Family Members of Employees

8.4.1 Categories of the Processed Data

The Company generally processes the following personal data in this group in a categoric manner:

- Identity information (name, surname, Turkish ID number, gender, number of children etc. as shown in the Minimum Living Allowance form),
- Contact details (address, telephone number),
- Health data (suffered/existing diseases, treatment details).

8.4.2 Purpose and Legal Processing Condition of Personal Data Processing

The abovementioned personal data categories are processed for the following purposes:

- Correct calculation and payment of the Minimum Living Allowance (MLA),
- Management of such benefits of employees and their family members as health insurance.

The legal processing conditions on which these activities are based are as follows:

- The obligation of processing personal data for the fulfilment of the legal liability of the Data Controller,
- The obligation of processing personal data for the establishment, exercise or protection of a right,
- The obligation of processing personal data for legitimate interest of the data controller on condition of not prejudicing to the fundamental rights and freedoms of the data subject,
- Obtaining of the explicit consent of the data subject, if required, in terms of health data.

8.4.3 To Whom the Personal Data May Be Transferred

The Company may transfer the abovementioned personal data to the following persons or institutions according to article 8 of the Law on domestic data transfer:

- Governmental agencies like the Social Security Institution and, if required, courts and execution offices, official and administrative bodies, law offices, auditing firms and financial advisers if the procurement of such services is necessary, insurance companies and intermediaries between insurance companies and the Company, business partners such as providers of information technologies service, executive assistants and **AG Anadolu Grubu Holding A.Ş.**

8.4.4 Retention Periods

The Company retains the abovementioned personal data for the periods shown in the Table of Retention and Destruction Periods as attached to the Personal Data Retention and Destruction Policy and destroys the same on an ex officio basis upon the disappearance of the reasons for the processing of such data.

Accordingly, any personal data belonging to family members of the employees are retained for the duration of the business relationship of relevant employee and for 11 years following the termination of the business relationship.

8.5 Non-continuous Daily Wage Agricultural Workers

They refer to the agricultural workers who are working in the farms of the Company based on a Labour Contract for Agricultural Mediation.

8.5.1 Categories of the Processed Data

The Company generally processed the following personal data in this group in a categoric manner:

- Identity information (name, surname, date of birth, place of birth, marital status, photograph etc.),
- Contact details (residential address, mobile phone number, e-mail address),
- Business experience details (educational background, previous business experiences),
- Physical environmental safety (images recorded by surveillance cameras, office entrance-exit records),



- Health data (blood group, information on state of health),
- Biometric data (fingerprint and retinal scanning record).

8.5.2 Purpose and Legal Processing Condition of Personal Data Processing

The abovementioned personal data categories are generally processed for the following purposes:

- Establishment of a business relationship and fulfilment of any contractual, legal and administrative obligations resulting from the business relationship,
- Planning the human resources processes,
- Planning and performance of employment activities,
- Securing and protection of our offices,
- Controlling office entrances and exits,
- Determination of working hours and correct calculation of progress payments.

The legal processing conditions on which these activities are based are as follows:

- Clear instruction by the applicable laws,
- The necessity of processing personal data belonging to parties of an agreement provided that such processing activity is directly related to the establishment or fulfilment of the agreement,
- The obligation of processing personal data for the fulfilment of the legal liability of the Data Controller,
- The obligation of processing personal data for the establishment, exercise or protection of a right,
- The obligation of processing personal data for legitimate interest of the data controller on condition of not prejudicing to the fundamental rights and freedoms of the data subject,
- Obtaining of the explicit consent of the data subject, if required.

8.5.3 To Whom the Personal Data May Be Transferred

The Company may transfer the abovementioned personal data to the following persons or institutions according to article 8 of the Law on domestic data transfer:

- Police Department, Gendarmerie Commandership, Public Health Centre, İŞKUR, courts and execution offices and such other official, legal and administrative organizations,
- Accounting and payroll service providers as the procurement of such services is necessary, law offices, auditing firms and financial advisers, digital agencies from which a service is procured, PDKS (personnel continuity tracking system) service providers and such other business partners and executive assistants.

8.5.4 Retention Periods

The Company retains the abovementioned personal data for the periods shown in the Table of Retention and Destruction Periods as attached to the Personal Data Retention and Destruction Policy and destructs the same on an ex officio basis upon the disappearance of the reasons for the processing of such data.

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Accordingly, general personal data belonging to our non-continuous daily wage agricultural workers are generally retained for the duration of the business relationship and for 11 years following the termination of the business relationship whereas health data are retained for the duration of the business relationship and for 15 years following the termination thereof.

8.6 Family Members of Non-continuous Daily Wage Agricultural Workers

They refer to the children of agricultural workers who are working in the farms of the Company based on a Labour Contract for Agricultural Mediation between the ages of 4-15.

8.6.1 Categories of the Processed Data

The Company generally processed the following personal data in this group in a categoric manner:

- Identity information (name, surname, Turkish ID number, date and place of birth, gender),
- Educational background,
- Physical environmental safety data (images recorded by surveillance cameras),
- Visual and auditory data (photograph, video and audio records).

8.6.2 Purpose and Legal Processing Condition of Personal Data Processing

The abovementioned personal data categories are generally processed for the following purposes:

- School enrolment of children within the scope of the so-called project of Training Our Worker's Guest Children (MİÇÖ),
- Ensuring uninterrupted education activities by means of providing transportation services to schools and other educational institutions,
- Provision of trainings during holidays in such areas as painting, handicraft, music, physical education etc.,
- Securing our offices and children,
- Publications in corporate web pages and social media platforms of corporate communication activities and social responsibility projects of the Company such as MİÇÖ for the purpose of carrying out promotion and announcement activities for the Company.

8.6.3 To Whom the Personal Data May Be Transferred

The Company may transfer the abovementioned personal data to the following persons or institutions according to article 8 of the Law on domestic data transfer:

- District National Education Directorate, Gendarmerie Commandership, Police Department, Public Health Centre, courts, execution offices and other official, administrative and legal authorities, organizations/institutions,
- Supplier firms from whom a service is procured such as contracted digital agencies, contracted healthcare institutions and law offices if procurement of a service is required.

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8.6.4 Retention Periods

The Company retains the abovementioned personal data for the periods shown in the Table of Retention and Destruction Periods as attached to the Personal Data Retention and Destruction Policy and destructs the same on an ex officio basis upon the disappearance of the reasons for the processing of such data.

Accordingly, any personal data belonging to the children of our non-continuous daily wage agricultural workers between the ages of 4-15 are retained for the duration of the business relationship of the legal guardian of children whereas their visual and auditory data are retained for 10 years.

8.7 Website and Corporate Network Visitors

8.7.1 Categories of the Processed Data

The Company generally processes the following personal data in this group in a categoric manner:

- Identity information (name, surname, Turkish ID number, date of birth),
- Contact details (mobile phone number),
- Process security data (MAC address detail, date and details of your internet access records, domain name, logs, IP numbers, frequency of visit and average time spent in our web page).

8.7.2 Purpose and Legal Processing Condition of Personal Data Processing

The abovementioned personal data categories are generally processed for the following purposes:

- To perform the required basic functions for the operation of the Company's websites,
- To analyse the Company's websites and improve their performance,
- To enhance the functionality of the Company's websites and provide ease of use.

8.7.3 To Whom the Personal Data May Be Transferred

The Company may transfer the abovementioned personal data to the following persons or institutions according to article 8 of the Law on domestic data transfer:

- Legally authorized public authorities upon request,
- Third parties whose services are procured by our Company, if required, our subsidiaries, business partners, group companies and providers of information processing and database services from which we procure a service.

8.7.4 Retention Periods

The Company retains the abovementioned personal data for the periods shown in the Table of Retention and Destruction Periods as attached to the Personal Data Retention and Destruction Policy and destructs the same on an ex officio basis upon the disappearance of the reasons for the processing of such data.



Accordingly, any personal data belonging to network visitors and website users are retained for 2 years.

8.8 Customers, Their Employees and Authorized Officers and Potential Customers

They refer to the employees and authorized officers of private companies and legal entities which supply fruit juice concentrates, fresh fruits and fructose products to the Company and potential customers to whom a product has not been provided yet.

8.1.1 Categories of the Processed Data

The Company generally processes the following personal data in this group in a categoric manner:

- Identity information (name, surname, place of birth, date of birth, Turkish ID number etc.),
- Contact details (address, telephone numbers and e-mail addresses of partners for private companies and authorized officers for legal entity customers),
- Finance and customer process data (taxpayer ID number, bank account details, tax office, IBAN number, check, bond, title deed details, request/complaint data etc.),
- Corporate identity data (title, position in the company, trade name).

8.8.2 Purpose and Legal Processing Condition of Personal Data Processing

The abovementioned personal data categories are generally processed for the following purposes:

- To establish communication in order to receive customers' requests,
- To perform activities for customer relations management and customer satisfaction,
- To carry out all kinds of operations and activities within the scope of the commercial and/or contractual relationship with our Company,
- To follow finance and accounting operations,
- To register any persons who are not included in the customer portfolio and contact with the Company for the first time as a potential customer and develop the customer portfolio,
- To perform financial and legal audits in the Company and AG ANADOLU GRUBU HOLDING A.Ş. for which the Company is acting as a subsidiary and all its affiliates/partnerships and fulfil any legal acts and actions, if necessary,
- To record and solve customer complaints.

The legal processing conditions on which these activities are based are as follows:

- The necessity of processing personal data belonging to parties of an agreement provided that such processing activity is directly related to the establishment or fulfilment of the agreement,
- The obligation of processing personal data for the fulfilment of the legal liability of the Data Controller,
- The obligation of processing personal data for the establishment, exercise or protection of a right,

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- The obligation of processing personal data for legitimate interest of the data controller on condition of not prejudicing to the fundamental rights and freedoms of the data subject,
- Obtaining of the explicit consent of the data subject, if required.

8.8.3 To Whom the Personal Data May Be Transferred

The Company may transfer the abovementioned personal data to the following persons or institutions according to article 8 of the Law on domestic data transfer:

- Domestic officials, administrative and legal authorities as our legal and administrative liabilities require as well as relevant ministries, courts and execution offices, tax offices and other related official bodies, authorities, organizations and institutions,
- Auditing firms from which a service is externally procured for the performance of a training,
- Banks, credit agencies, contracted agencies, shipment and logistics firms etc.,
- Legal counsellors and financial advisers who have a proxy relationship in case of any probable legal disputes,
- Providers of information processing and database services,
- AG Anadolu Grubu Holding A.Ş.

The Company may further transfer data to the following persons or institutions in some cases in compliance with article 9 of the Law concerning data transfer abroad:

- The locations abroad due to the fact that the servers of our information systems and solutions are located abroad.

8.4.4 Retention Periods

The Company retains the abovementioned personal data for the periods shown in the Table of Retention and Destruction Periods as attached to the Personal Data Retention and Destruction Policy and destructs the same on an ex officio basis upon the disappearance of the reasons for the processing of such data.

Accordingly, any personal data belonging to the employees and authorized officers of our real and legal person customers are retained for 11 years starting from the last commercial relationship record for our customers with a commercial relationship and for 2 years for our potential customers who have not been our customers yet.

9. EFFECTIVENESS

This General Policy for the Processing and Protection of Personal Data was accepted on 25/05/2019 and took effect upon its publication in the corporate web pages of the Company (www.anadoluetap.com, www.meyvedenseker.com and www.doalmeyve.com). The Policy shall be able to be updated from time to time in order to comply with any amended conditions and applicable legislation.