



**PERSONAL DATA PROTECTION  
AND PROCESSING POLICY**



# **BMC POWER MOTOR VE KONTROL TEKNOLOJİLERİ ANONİM ŞİRKETİ**

## **PERSONAL DATA PROTECTION AND PROCESSING POLICY**

## TABLE OF CONTENTS

### PART ONE

#### 1. INTRODUCTION

1.1	Introduction	4
1.2	Purpose of the Policy	4
1.3	Scope of the Policy	5
1.4	Definitions	6
1.5	Enforcement of the Policy	8

### PART TWO

#### 2. PROTECTION OF PERSONAL DATA

2.1	Security of Personal Data	8
2.2	Audit	8
2.3	Privacy	8
2.4	Unauthorized Disclosure of Personal Data	8
2.5	Protection of the Data Subjects' Legal Rights	8
2.6	Protection of Special Categories of Personal Data	9

### PART THREE

#### 3. PROCESSING AND TRANSFER OF PERSONAL DATA

3.1	General Principles for Processing of Personal Data	9
3.2	Conditions for Processing of Personal Data	9
3.3	Conditions for Processing of Special Categories of Personal Data	9
3.4	Conditions for Transfer of Personal Data	9

### PART FOUR

#### 4. CATEGORIZATION OF PERSONAL DATA, PURPOSES OF PROCESSING AND TRANSFER, AND THE PERSONS TO WHOM THEY WILL BE TRANSFERRED

4.1	Categorization of Personal Data	10
4.2	Purposes of Processing of Personal Data	11
4.3	Purposes of Transfer of Personal Data	12
4.4	The Persons to whom Personal Data will be Transferred	12

## **PART FIVE**

### **5. METHOD AND LEGAL REASON OF COLLECTION OF PERSONAL DATA, DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA AND STORAGE PERIOD**

5.1	Method and Legal Reason of Collection of Personal Data	13
5.2	Deletion, Destruction or Anonymization of Personal Data	13
5.3	Personal Data Storage Period	13

## **PART SIX**

### **6. INFORMING THE DATA SUBJECT, AND THE DATA SUBJECT'S RIGHTS PURSUANT TO THE PDP LAW**

6.1	Informing the Data Subject	14
6.2	Data Subject's Rights pursuant to the PDP Law	14
6.3	Cases where the Policy and the Law will not be Applied in Part or in Whole	15

## **PART SEVEN**

### **7. CATEGORIZATION OF DATA SUBJECTS AND MATCHING THEM WITH PERSONAL DATA**

7.1	Categorization of Data Subjects	16
7.2	Matching Personal Data with Data Subjects	16

## PART ONE 1. INTRODUCTION

### 1.1 Introduction

As **BMC POWER MOTOR VE KONTROL TEKNOLOJİLERİ ANONİM ŞİRKETİ** (the “Company” or “BMC POWER”), we attribute utmost importance to the lawful protection and processing of Personal Data pursuant to the Law no. 6698 on Protection of Personal Data (the “Law”) and pay due diligence and act with this approach in all our planning and activities. With this awareness, as BMC POWER, we take all organizational and technical measures for the protection and processing of Personal Data.

### 1.2 Purpose of the Policy

The purpose of the Personal Data Protection and Processing Policy (the “Policy”) is to protect, to the maximum extent possible, the fundamental rights and freedoms of individuals, including, particularly, the right to privacy as set out in article 20 of the Constitution, in the protection and processing of personal data in accordance with the purpose of the Law, and to inform Data Subjects about the obligations of and the principles and procedures and principles to be followed by our Company pursuant to the Law. Acting under its capacity as the Data Controller, BMC POWER lawfully processes the personal data of its employees and company officers providing services in the fields of Design, R&D, engineering, production, sales and after-sales, making available and offering configured vehicles, spare parts, engine and castings, and communicating on its own behalf or in the capacity of a representative in order to conduct its business activities, or of other natural persons establishing a relationship by making a job application or for any other purposes or through any other means or channels. Another purpose of this policy is to inform data subjects by providing explanations about these processing activities conducted by BMC POWER and the systems related with personal data, and thus, to ensure transparency regarding personal data. In this context, BMC POWER has elaborately explained in this Policy, the processing of personal data under the Law, the data subjects whose data are processed and the rights of these persons together with the use of cookies and similar technologies.

### 1.3 Scope of the Policy

This Policy has been prepared for and shall apply to Company Shareholders, Company Business Partners, Company Officials, Employee Candidates, Visitors, Company Customers, Potential Customers, and Third Parties, providing that they are natural persons. The Company informs these Data Subjects about the Law by publishing this Policy on its website. This Policy shall not apply to legal persons, regardless of their capacities. The “Personal Data Processing Policy for Employees” shall apply for the employees of our Company. This Policy shall apply to the aforementioned data subjects only if their Personal Data are processed by our Company whether by automated means in part or in whole, or non-automated means that are a part of any data recording system. This Policy shall not apply if the relevant data does not fall within the scope of “Personal Data” as specified below or the Personal Data processing carried out by our Company is not conducted through the aforementioned means.

#### 1.4 Definitions

The terms used in the implementation of this policy shall have the following meanings:

<b>Explicit Consent</b>	:	The freely given, specific and informed consent related to a specific matter.
<b>Anonymization</b>	:	Rendering personal data impossible to link with an identified or identifiable natural person under any circumstances, even by matching them with other data.
<b>Employee Candidate</b>	:	Natural persons that have applied for a job to our Company through any means and made their CVs and related data available for review by our Company.
<b>Contact person</b>	:	The natural person notified by the data controller at the time of registration with the Registry, who will serve as the point of contact for communications to be established with the Authority in relation to the obligations of the legal entities resident in Türkiye and the data controller representatives of the legal persons not resident in Türkiye within the scope of the Law and the secondary regulations that will be issued based on this Law.
<b>Employee</b>	:	All natural persons working for our Company under an employment contract.
<b>Processing of Personal Data</b>	:	Any operation or set of operations performed upon Personal Data, whether by automated means, in part or in whole, or non-automated means that are a part of any data recording system, such as collection, recording, storage, preservation, alteration, revision, disclosure, transmission, acquisition, retrieval, categorization or blocking the use of such data.
<b>PDP Board</b>	:	the Personal Data Protection Board.
<b>Data Subject/ Related Person</b>	:	Company Shareholders, Company Business Partners, Company Officials, Employee Candidates, Visitors, Company Customers, Potential Customers, and Third Parties whose Personal Data are processed.
<b>Personal data processing inventory</b>	:	The inventory created and detailed by data controllers by way of associating their personal data processing activities that they conduct depending on their business processes with personal data processing purposes, data categories, recipient groups the data are transferred to and data subject groups, and elaborating the maximum storage period required for the purposes of processing of personal data, the personal data planned to be transferred to foreign countries, and the measures taken for data security.
<b>Personal data storage and destruction policy</b>	:	The policy that data controllers issue as a basis for determination of the maximum storage period required for the purpose of processing of personal data as well as the erasure, destruction and anonymization of personal data.
<b>Personal Data</b>	:	Any information relating to an identified or identifiable natural person.

<b>Company Customer</b>	:	The natural persons that use or have used the products and services offered by our Company, no matter whether they have a contractual relationship with our Company.
<b>Special Categories of Personal Data</b>	:	Any personal data relating to race, ethnic origin, political opinion, philosophical beliefs, religion, sect or other beliefs, dressing, association, foundation or trade-union membership, health, sexual life, criminal convictions and offences and related security measures as well as biometric and genetic data constitute special categories of personal data.
<b>Potential Customer</b>	:	The natural persons that have requested to use or shown interest in using our products and services or that have been considered as likely to have such an interest in accordance with commercial practices and rules of integrity.
<b>Company/ Our Company</b>	:	BMC POWER MOTOR VE KONTROL TEKNOLOJİLERİ ANONİM ŞİRKETİ
<b>Company Shareholder</b>	:	The natural-person shareholders of BMC POWER MOTOR VE KONTROL TEKNOLOJİLERİ ANONİM ŞİRKETİ
<b>Company Business Partner, and Business Partners' Shareholders, Officials, Employees</b>	:	All natural persons that have any kind of business relationship with our Company and all natural persons working for the natural or legal persons that have any kind of business relationship with our Company (such as business partners, suppliers, etc.), including their employees, shareholders, and officials.
<b>Company Official</b>	:	Members of the board of directors and other authorized natural persons of BMC POWER MOTOR VE KONTROL TEKNOLOJİLERİ ANONİM ŞİRKETİ
<b>Third Party</b>	:	Other persons not covered by BMC POWER MOTOR VE KONTROL TEKNOLOJİLERİ ANONİM ŞİRKETİ Personal Data Protection and Processing Policy prepared for Company Employees and not falling into any Data Subject category under this Policy.
<b>Data category</b>	:	The personal data category of the group or groups of data subjects by which personal data are grouped according to their common features.
<b>Data subject group</b>	:	The category of data subjects whose personal data are processed by data controllers.
<b>Data controllers' registry information system (VERBİS)</b>	:	The information processing system established and managed by the Presidency and accessible via Internet, which will be used by data controllers for application to the Registry and other operations related with the Registry.
<b>Data Processor</b>	:	The natural or legal person processing Personal Data on behalf of the data controller based on the authorization granted by the data controller.
<b>Data Recording System</b>	:	The recording system through which Personal Data are structured and processed according to specific criteria.
<b>Data Controller</b>	:	The person that determines the purposes and means of processing of Personal Data and manages the system where data are filed systematically (data recording system).

<b>Visitor</b>	:	All natural persons entering the physical premises of our Company for various purposes or visiting our websites for any purposes.
<b>Procedure on Management of Requests from Data Owners</b>	:	The procedure prepared within the structure of BMC POWER and detailing the process to be used to meet the requests that may be received from data subjects under the Law.

### 1.5 Enforcement of the Policy

The Policy that enters into force following its preparation by BMC POWER MOTOR VE KONTROL TEKNOLOJİLERİ ANONİM ŞİRKETİ is published on the Company's website (www.bmcpower.com.tr) and made accessible to relevant persons upon their requests. BMC POWER is entitled to make any amendment to this policy at any time within the Framework of the Law, secondary legislation and the PDP Board's decisions.

## PART TWO

### 2. PROTECTION OF PERSONAL DATA

#### 2.1 Security of Personal Data

Our Company takes any and all technical and organizational measures to prevent unlawful processing of or access to Personal Data and to ensure an appropriate level of security for the purpose of protection of Personal Data in accordance with the Law.

#### 2.2 Audit

Our company conducts and commissions others to conduct necessary audits to ensure the data security described above and the regularity and continuity of the measures taken.

#### 2.3 Privacy

Our company takes all necessary technical and organizational measures to prevent the relevant data controllers and data processors from disclosing Personal Data to any person in breach of the provisions of the Law and the Policy and from using them for any purposes other than the processing purposes, to the extent permitted by technological possibilities and implementation costs. In this context, our Company conducts information and training activities to inform our Company employees about the Law and the Policy.

#### 2.4 Unauthorized Disclosure of Personal Data

If the Personal Data processed by our Company are unlawfully obtained by others; our Company takes necessary actions to notify this situation to the relevant Data Subject and the PDP Board as soon as possible. If deemed necessary by the PDP Board, this may be announced on the website of the PDP Board or by any other method to be approved by the PDP Board.



## **2.5 Protection of the Data Subjects' Legal Rights**

Our company protects and takes all necessary measures to protect all legal rights of Data Subjects through the implementation of the Policy and the Law.

## **2.6 Protection of Special Categories of Personal Data**

Our Company sensitively takes adequate measures determined by the PDP Board within the framework of the Policy on the Processing and Protection of Special Categories of Personal Data.

### **PART THREE**

## **3. PROCESSING AND TRANSFER OF PERSONAL DATA**

### **3.1 General Principles for Processing of Personal Data**

Our Company processes Personal Data in accordance with the procedures and principles stipulated in the Law and this Policy. When processing Personal Data, our Company complies with the following principles.

- Compliance with the Law and the Rules of Good Faith
- Being Accurate and, if necessary, Up-to-date
- Processing for Specified, Explicit and Legitimate Purposes
- Being Relevant, Limited and Proportionate to the Purposes for which data are processed
- Storage for the Time Period stipulated in the Relevant Legislation or required by the Purpose for which data are processed

### **3.2 Conditions for Processing of Personal Data**

Personal data are processed within BMC POWER based on the explicit consent received from data subjects or in the light of the activities that can be conducted without an explicit consent pursuant to articles 5 and 6 of the Law; and such data are processed only within the framework of the purposes illustrated in the 'Purposes of Processing of Personal Data' section of this Policy. Our Company may process Personal Data without any need for explicit consent in case of existence of any of the following conditions.

### **3.3 Conditions for Processing of Special Categories of Personal Data**

Our company does not process Special Categories of Personal Data without the explicit consent of the data subject. However, Personal Data other than health and sexual life details may be processed without any need for the data subject's explicit consent in cases stipulated by laws. Personal Data on health and sexual life are processed by our Company, without seeking the data subject's explicit consent, only for the purposes of protection of public health, provision of preventive medicine, medical diagnosis, and treatment and nursing services, and planning and management of healthcare services and their financing, under the conditions of our non-disclosure obligation. Our Company takes necessary actions to take adequate measures for the processing of Special Categories of Personal Data, as determined by the Board.

### 3.4 Conditions for Transfer of Personal Data

Our Company may transfer the Personal Data and Special Categories of Personal Data of the Data Subjects to third parties in accordance with the Law by meeting necessary privacy requirements and taking security measures in line with the purposes of processing of Personal Data. Our Company acts in line with the regulations stipulated by the Law while transferring Personal Data. In this context, our Company may lawfully and legitimately transfer Personal Data to third parties for the purposes of processing of Personal Data on the basis of, and limited to, one or more of the conditions for processing of Personal Data specified in article 5 of the Law which are listed below:

- If the Data Subject has provided their explicit consent;
- If there is an explicit regulation in the Laws regarding the transfer of Personal Data;
- If it is required to protect the life or physical integrity of the Data Subject or someone else, and the Data Subject is unable to explain their consent due to actual impossibility or their consent is not legally valid;
- If it is required to transfer Personal Data pertaining to contracting parties providing that it is directly related to the conclusion or performance of a contract;
- If the transfer of Personal Data is required for fulfilment of our Company's legal obligations;
- If the Personal Data have been made public by the Data Subject themselves;
- If the transfer of Personal Data is required for establishment, exercise or protection of a right;
- If the transfer of Personal Data is required for our Company's legitimate interests, without prejudice to the fundamental rights and freedoms of the Data Subject.

#### 3.4.1 Conditions for Transfer of Personal Data Abroad

Our Company may transfer Personal Data and Special Categories of Personal Data of the Data Subjects to third parties abroad by taking necessary measures in line with the purposes of processing of Personal Data. Our Company may transfer Personal Data to foreign countries which are declared by the PDP Board to have adequate protection, or in the absence of adequate protection, to foreign countries where data controllers in Türkiye and in the relevant foreign country undertake to provide adequate protection in writing and where it is permitted by the PDP Board.

## PART FOUR

### 4. CATEGORIZATION OF PERSONAL DATA, PURPOSES OF PROCESSING AND TRANSFER, AND THE PERSONS TO WHOM THEY WILL BE TRANSFERRED

#### 4.1 Categorization of Personal Data

Personal data is processed by our company by categorizing as follows:

##### 4.1.1 Identity Data

Data containing information about the identity of the person: name-surname, Turkish ID number, marital status, nationality, parents names and surnames, place and date of birth, sex, personal background, factory and registration number of employees, title deed and other official registry information and other identification details and driving license, identity card and passport and other documents containing such information as well as tax number, SGK (Social Security Institution) number, signature, vehicle license plate and any other details.

#### **4.1.2 Contact Data**

Phone number, address, e-mail address, fax number, IP address and other details.

#### **4.1.3 Process/Transaction Security Data**

Personal data of either the Data Subject or the Company that are processed for technical, organizational, legal and commercial security of the Company while conducting the Company's activities.

#### **4.1.4 Financial Data**

Personal data processed with regard to the information, documents and records showing any and all financial results created under the employer-employee relationship that our Company has established with the Data Subject, and bank account number, branch code, bank card details, IBAN number, credit card details, financial profile, credit rating, assets data, income details and other information.

#### **4.1.5 Audio-Visual Data**

Photographs, footage, voice records and all data containing such data and any other details.

#### **4.1.6 Personnel Data**

Any and all personal data processed to obtain information that will be taken as basis for the protection of personnel-related rights of the Data Subject and the natural persons that who have working relationships with them.

#### **4.1.7 Location Data**

Information determining the location of the Data Subject while they are using Company vehicles within the scope of the activities and operations of the Company or other companies and institutions that the Company works with; GPS location, travel data and other details .

#### **4.1.8 Data about Family Members and Relatives**

Identity data and contact data - as defined above - pertaining to the family members (e.g., spouse, mother, father, child), relatives and emergency contacts of the Data Subject that are processed within the scope of the activities and operations of the Company or other companies and institutions that the Company works with, or for the purposes of protecting the legal and other interests of the Company and the Data Subject.

#### **4.1.9 Physical Premises Security Data**

Personal data regarding the records and documents obtained when entering the physical premises and during the stay in such premises; footage, fingerprint records, and the records taken at the security point, and any other information on the workplace.

#### **4.1.10 Legal Action Data**

Data processed for the determination and follow-up of the Company's legal receivables and rights and discharge of its debts and those processed within the scope of its legal obligations.

#### **4.1.11 Special Categories of Personal Data**

Data specified in article 6 of the Law (health data, biometric data, region, and association membership details, etc.)

#### **4.1.12 Request/Complaint Management Data**

Personal data regarding the reception and evaluation of requests or complaints addressed to our Company.

#### **4.2 Purposes of Processing of Personal Data**

Our Company provides data subjects with information about the purposes for which Personal Data can be processed, and the persons to whom and for which purposes the processed data can be transferred, in order to fulfil the disclosure requirement specified in Article 10 of the Law.

Your personal data are processed within the scope of the personal data processing conditions specified in articles 5 and 6 of the Law, limited with the purposes of planning and implementation of our human resources policies in the best manner possible; correct planning and management of our business partnerships and strategies; ensuring the legal, commercial, and physical security of our Company and business partners; ensuring the corporate functioning of our Company; conducting efforts to allow you to get the most out of the products and services offered by our Company; making the services and products offered by our Company available to you as customized according to your requests, needs, and demands; ensuring data security at the highest level; establishing databases; improving the services provided on our Company's website; contacting those submitting their requests and complaints to our Company; and troubleshooting the errors occurring on our Company's website.

#### **4.3 Purposes of Transfer of Personal Data**

Your personal data are transferred within the scope of the conditions specified in articles 8 and 9 of the Law, limited with the purposes of planning and implementation of our human resources policies in the best manner possible; correct planning and management of our business partnerships and strategies; ensuring the legal, commercial, and physical security of our Company and business partners; ensuring the corporate functioning of our Company; conducting efforts to allow you to get the most out of the products and services offered by our Company; making the services and products offered by our Company available to you as customized according to your requests, needs, and demands; ensuring data security at the highest level; establishing databases; improving the services provided on our Company's website; contacting those submitting their requests and complaints to our Company; and troubleshooting the errors occurring on our Company's website.

#### **4.4 The Persons to whom Personal Data will be Transferred**

Your Personal Data may be transferred to our shareholders, business partners, suppliers, subsidiaries, companies and institutions that we work with, companies from which we outsource services to fulfil our contractual or legal obligations, and competent authorities and agencies. The nature of these transfers and the parties to whom the personal data are transferred vary depending on the type and nature of the relationship between the data subject and BMC POWER, the purpose of the transfer, and the applicable legal basis; however, these parties generally include:

- Legal authorities such as law offices and institutions from which support services are outsourced for legal activities;
- Business units under the roof of BMC POWER to ensure coordination, cooperation and efficiency;
- Research companies for various purposes such as customer satisfaction, etc.;
- Banks that will allow for execution of financial transactions;
- Ministry of Science, Industry and Technology (MoSIT) for the R&D Center activity period report;
- Ministry of National Defence, Department of Technical Services for defence industry projects;
- Ministry of Environment and Urbanization for waste removal and disposal processes;
- Health institutions or hospitals in case of work accidents;

- Customs Consultant, Customs Directorate, Port Authority for import and export operations;
- Aegean Region Chamber of Industry, Directorate of Industry for the capacity report;
- Izmir Governorship OHAL (State of Emergency) Office, Security General Directorate and the consignee company for finished products in the defence industry.

## **PART FIVE**

### **5. METHOD AND LEGAL REASON OF COLLECTION OF PERSONAL DATA, DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA AND STORAGE PERIOD**

#### **5.1 Method and Legal Reason of Collection of Personal Data**

For the purpose of checking the compliance with Article 1 setting forth the purpose of the Law and Article 2 setting out the scope of the Law, Personal Data are collected by technical and other methods in any verbal, written and electronic environment through various ways such as call center, our Company's website, mobile application, etc. to fully and accurately fulfil the legal liabilities within the framework of legislation, contract, request and optional legal reasons in order to achieve the purposes set out in the Policy, and then they are processed by our Company or data processors appointed by our Company.

#### **5.2 Deletion, Destruction or Anonymization of Personal Data**

Without prejudice to the provisions in other laws regarding the deletion, destruction or anonymization of Personal Data; our Company deletes, destroys or anonymizes the Personal Data directly or upon the data subject's request in accordance with the Personal Data Storage and Destruction Policy in the event that the reasons requiring the processing of such data cease to exist, although they have been processed in accordance with the provisions of the Law and other applicable laws.

When any personal data are deleted, such data are destroyed so that they cannot be reused and restored in any way whatsoever. Accordingly, the data are deleted from documents, files, CDs, discs, hard discs in/on which they are stored, so that they cannot be restored.

The destruction of data means the destruction of data storage materials in/on which the data are stored, such as documents, files, CDs, disc, hard discs, etc., so that the information cannot be restored and used again.

The anonymization of data means rendering Personal Data impossible to link with an identified or identifiable natural person under any circumstances, even by matching them with other data.

#### **5.3 Personal Data Storage Period**

Our Company stores the Personal Data for the periods stipulated by the laws and other legislation. In the event that the laws and other legislation do not contain any provision stipulating the time period for which the Personal Data should be stored, Personal Data are processed for the period until that the purpose of processing that Personal Data is achieved with the activity conducted by our Company while processing the relevant Personal Data; and then they are deleted, destroyed and anonymized in accordance with the Personal Data Storage and Destruction Policy.



## PART SIX

### 6. INFORMING THE DATA SUBJECT, AND THE DATA SUBJECT'S RIGHTS PURSUANT TO THE PDP LAW

#### 6.1 Informing the Data Subject

Our Company informs the Data Subjects while obtaining personal data in accordance with Article 10 of the PDP Law. In this regard, it provides information about the identity of the Contact Person, if any, for which purposes the personal data will be processed, to whom and for which purposes the processed personal data may be transferred, the method and legal reason of collection of personal data, and the rights of the Data Subject.

#### 6.2 Data Subject's Rights pursuant to the PDP Law

Our Company informs you of your rights pursuant to Article 10 of the Law; provides guidance to you on how to use such rights, and performs the necessary internal functioning, organizational and technical arrangements to this effect. Pursuant to Article 11 of the Law, our Company informs the persons whose personal data are collected about the fact that they are entitled;

- to learn whether their personal data are processed or not;
- if processed, to request information regarding the processing of their personal data;
- to learn the purpose of processing and whether their personal data are used for intended purposes or not;
- to know the third parties to whom their personal data are transferred at home or abroad;
- to request for correction of their personal data if they have been processed incompletely or inaccurately;
- to request for erasure or destruction of their personal data under the conditions stipulated in article 7 of the Law;
- to request for notification of the actions taken pursuant to subparagraphs (d) and (e) of Article 11 of the Law to the third parties to whom their personal data have been transferred;
- to object to any results that may arise to their detriment through analysis of their processed data exclusively via automated means;
- to claim for compensation of any loss or damages that they may incur due to unlawful processing of their personal data.

You can submit your requests regarding the implementation of the Law to our Company by using the **Law on Protection of Personal Data - Data Subject Application Form** in writing or with secure electronic signature or through other methods to be designated by the Personal Data Protection Board (the "**Board**"), following the procedures specified in the application form. Our Company concludes your requests specified in application free of charge as soon as possible or within thirty days at the latest, depending on the nature of the request. However, if the relevant action requires an additional cost, the fee in the tariff determined by the Board may be charged.

Our Company may either accept the request or reject it by explaining the relevant reason and sends its response to the relevant person in writing or electronically. If the request in the application is accepted, our Company takes the necessary action as soon as required. If the application is attributable to our Company's fault, the fee collected is refunded to the data subject.

In cases where the application is rejected, or the response given is found insufficient or the application is not answered within due time; the data subject is entitled to file a complaint with the Board within thirty days from the date of receipt of the response, and, in any event, within sixty days from the date of application.

### **6.3 Cases where the Policy and the Law will not be Applied in Part or in Whole**

These provisions of this Policy and of the Law shall not be applied in the following cases:

- Processing of personal data by natural persons within the scope of activities related to themselves or their family members living together in the same household, provided that the relevant data are not disclosed to third parties and the data security obligations are complied with.
- Processing of personal data for official statistics and research, planning, and statistical purposes through anonymization of such data.
- Processing of personal data for artistic, historical, literary, or scientific purposes or within the scope of freedom of expression, provided that national defence, national security, public security, public order, economic security, privacy, or personal rights are not violated or the processing does not constitute a criminal offense.
- Processing of personal data within the scope of preventive, protective, and intelligence activities carried out by governmental authorities and agencies duly empowered and authorized by laws to ensure national defence, national security, public security, public order, or economic security.
- Processing of personal data by judicial authorities or execution authorities with regard to investigation, prosecution, criminal proceedings, or execution proceedings.

Providing that this complies with and is proportionate to the purpose and fundamental principles of this Policy and the Law, Article 10 governing the data controller's obligation to inform, Article 11 governing the data subject's rights, excluding the right to claim for compensation, and Article 16 governing the requirement to register with the Data Controllers Registry shall not apply in the following cases:

- Personal data processing is required for the prevention of a crime or for conducting a criminal investigation.
- Processing of data made public by the data subject themselves.
- Personal data processing is required for the conduct of supervisory or regulatory duties, and for disciplinary investigation or prosecution by empowered and authorized governmental authorities and agencies as well as professional institutions bearing the status of governmental agencies, in accordance with the powers granted by laws.
- Personal data processing is required for the protection of the State's economic and financial interests regarding budgetary, tax-related, and financial issues.

**PART SEVEN****7. CATEGORIZATION OF DATA SUBJECTS AND MATCHING THEM WITH PERSONAL DATA****7.1 Categorization of Data Subjects**

Only natural persons can benefit from the scope of protection under this Policy and the Law; the Data Subjects falling in this scope are grouped as follows:

<b>Employee Candidate</b>	:	Natural persons that have applied for a job to our Company through any means and made their CVs and related data available for review by our Company.
<b>Company Business Partner, and Business Partners' Shareholders, Officials, Employees</b>	:	All natural persons that have any kind of business relationship with our Company and all natural persons working for the natural or legal persons that have any kind of business relationship with our Company (such as business partners, suppliers, etc.), including their employees, shareholders, and officials
<b>Company Customer</b>	:	The natural persons that use or have used the products and services offered by our Company, no matter whether they have a contractual relationship with our Company.
<b>Potential Customer</b>	:	The natural persons that have requested to use or shown interest in using our products and services or that have been considered as likely to have such an interest in accordance with commercial practices and rules of integrity.
<b>Company Shareholder</b>	:	The natural-person shareholders of BMC POWER MOTOR VE KONTROL TEKNOLOJİLERİ ANONİM ŞİRKETİ
<b>Company Official</b>	:	Members of the board of directors and other authorized natural persons of BMC POWER MOTOR VE KONTROL TEKNOLOJİLERİ ANONİM ŞİRKETİ
<b>Third Party</b>	:	Other persons not covered by BMC POWER MOTOR VE KONTROL TEKNOLOJİLERİ ANONİM ŞİRKETİ Personal Data Protection and Processing Policy prepared for Company Employees and not falling into any Data Subject category under this Policy
<b>Visitor</b>	:	All natural persons entering the physical premises of our Company for various purposes or visiting our websites for any purposes.



## 7.2 Matching Personal Data with Data Subjects

The matching of the categorized Personal Data as described and detailed above with the categorized Personal Data Subjects is provided below.

<b>Identity Data</b>	:	Company Shareholder; Company Official; Company Customer; Potential Customer; Company Business Partner, and Business Partners' Shareholders, Officials, Employees; Employee Candidate; Visitor, Third Parties
<b>Contact Data</b>	:	Company Shareholder; Company Official; Company Customer; Potential Customer; Company Business Partner, and Business Partners' Shareholders, Officials, Employees; Employee Candidate; Visitor, Third Parties
<b>Process/Transaction Security Data</b>	:	Company Shareholder; Company Official; Company Customer; Potential Customer; Company Business Partner, and Business Partners' Shareholders, Officials, Employees; Employee Candidate; Visitor, Third Parties
<b>Financial Data</b>	:	Company Shareholder; Company Official; Company Customer; Potential Customer; Company Business Partner, and Business Partners' Shareholders, Officials, Employees; Employee Candidate; Visitor, Third Parties
<b>Audio-Visual Data</b>	:	Company Shareholder; Company Official; Company Customer; Potential Customer; Company Business Partner, and Business Partners' Shareholders, Officials, Employees; Employee Candidate; Visitor, Third Parties
<b>Personnel Data</b>	:	Company Business Partner, and Business Partners' Shareholders, Officials, Employees; Employee Candidate; Third Parties
<b>Location Data</b>	:	Company Business Partner, and Business Partners' Shareholders, Officials, Employees
<b>Data about Family Members and Relatives</b>	:	Company Customer; Potential Customer; Company Business Partner, and Business Partners' Shareholders, Officials, Employees; Employee Candidate; Visitor, Third Parties
<b>Physical Premises Security Data</b>	:	Company Shareholder; Company Official; Company Business Partner, and Business Partners' Shareholders, Officials, Employees; Employee Candidate; Visitor, Third Parties
<b>Legal Action Data</b>	:	Potential Customer; Company Business Partner, and Business Partners' Shareholders, Officials, Employees; Third Parties
<b>Special Categories of Personal Data</b>	:	Company Shareholder; Company Official; Company Customer; Potential Customer; Company Business Partner, and Business Partners' Shareholders, Officials, Employees; Employee Candidate; Visitor, Third Parties
<b>Request/Complaint Management Data</b>	:	Company Shareholder; Company Official; Company Customer; Potential Customer; Company Business Partner, and Business Partners' Shareholders, Officials, Employees; Employee Candidate; Visitor, Third Parties