

PRIVATE DATA PROTECTION and PROCESS POLICY

CYBERWHIZ L.T.D. PRIVATE DATA PROTECTION and PROCESS POLICY DOCUMENT INFORMATION

Document Name: CYBERWHIZ L.T.D. Private Data Protection and Process Policy.

Targeted Audience: Individuals who is not CYBERWHIZ L.T.D. employee.

Prepared by: CYBERWHIZ L.T.D.,

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Abbreviations

GDPR	General Data Protection Regulation
KVKK	Personal Data Protection Law
EDPS	European Data Protection Supervisor

1. Introduction

The protection of personal data is among the top priorities of CYBERWHIZ L.T.D. Within the framework of this CYBERWHIZ L.T.D. Personal Data Protection and Processing Policy (“Policy”), the principles adopted in the execution of personal data processing activities carried out by CYBERWHIZ L.T.D. (“Company” or “CyberWhiz”) are explained below, and thus our Company declares the fundamental principles it has adopted in terms of compliance with the regulations in the Personal Data Protection Law No. 6698 (“Law”) and ensures the necessary transparency by informing personal data owners. With full awareness of our responsibility in this context, your personal data is processed and protected within the scope of this Policy.

CYBERWHIZ L.T.D.

19 MAYIS MAH. 19 MAYIS CAD. NO: 3 İÇ KAPI NO: 16 SISLI/ISTANBUL TÜRKİYE

The activities carried out by our Company regarding the protection of our employees’ personal data are managed under the CYBERWHIZ L.T.D. Employee Personal Data Protection and Processing Policy, which is written in parallel with the principles in this Policy.

2. Scope

This Policy pertains to all personal data processed in non-automatic ways as part of any data recording system, concerning individuals other than our Company employees. Data is not processed automatically. Detailed information regarding the respective personal data subjects can be accessed from the ANNEX 2 (“ANNEX 2 - Personal Data Subjects”) document of this Policy.

3. Policy and Relevant Legislation Implementation

The relevant legal regulations in force regarding the processing and protection of personal data will primarily be applied. In the event of any discrepancy between the existing legislation and the Policy, our Company acknowledges that the current legislation will prevail. The Policy regulates the rules set forth by the relevant legislation by concretizing them within the scope of Company practices.

4. Policy Effectiveness

This Policy prepared by our Company is dated [06.05.2024]. Should the entire Policy or specific articles be renewed, the effective date of the Policy will be updated. The Policy is published on our Company’s website (www.cyberwhiz.co.uk) and is made available to the data subjects upon request.

5. Matters Related to Protection of Personal Information

5.1. Protection of Personal Information

In accordance with Article 12 of the Law, our Company takes the necessary measures according to the nature of the data to be protected to prevent the unlawful disclosure, access, transfer of personal data, or other potential security deficiencies. Within this scope, our Company adopts necessary technical and administrative measures and conducts or arranges audits in line with the

guidelines published by the Personal Data Protection Board (“Board”) to ensure the required level of security.

5.2. Protection of Special Category Personal Information

Special Category personal data is given special importance under the Law due to the risk of causing victimization or discrimination when processed unlawfully. This “special category” personal data includes data related to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, attire, association, foundation or union membership, health, sexual life, criminal convictions, and security measures, as well as biometric and genetic data. In this context, our Company does not collect or process any special category personal data.

5.3. Increasing Awareness and Supervision of Business Units on Personal Data Protection and Process Matters

Our Company ensures the organization of necessary trainings for business units to increase awareness aimed at preventing the unlawful processing of personal data and unlawful access to data, as well as to ensure the protection of the data. Our Company establishes the necessary systems to create awareness of the protection of personal data among existing employees and those newly joining the company and works with consultants when needed on the matter. In this direction, our Company evaluates participation in relevant trainings, seminars, and information sessions, and organizes new trainings in parallel with updates to the relevant legislation.

6. Matters Related to Process of Personal Data

6.1. Processing of Personal Information in Accordance with the Principles Envisaged in the Legislation

6.1.1. Processing in Accordance with Law and Principle of Integrity

Personal data are processed in accordance with the general principle of trust and honesty, in a manner that does not harm the fundamental rights and freedoms of individuals. Within this framework, personal data are processed to the extent required by our Company’s business activities and limited to them.

6.1.2. Ensuring that Personal Data is Accurate and Updated as Necessary

Our Company takes the necessary measures to ensure that personal data is accurate and up to date during the processing period and establishes the necessary mechanisms to ensure the accuracy and currency of personal data at regular intervals.

6.1.3. Processing for Specific, Explicit, and Legitimate Purposes

Our Company clearly sets out the purposes for processing personal data and processes them within the scope of purposes related to its business activities, in line with these activities.

6.1.4. Processing in a Manner That Is Relevant, Limited, and Proportionate to the Purposes for Which They Are Processed

Our Company collects personal data only to the extent necessary for its business activities and processes it limited to the purposes identified.

6.1.5. Retention for the Period Required by the Relevant Legislation or Necessary for the Purpose for Which They Are Processed

Our Company retains personal data for the duration necessary for the purposes for which they are processed and for the minimum period stipulated by the relevant legal legislation. In this context, our Company first determines whether a specific retention period for personal data is set out in the relevant legislation and complies with this period if it is specified. If there is no legal period, personal data are retained for the period necessary for the purposes for which they are processed. Personal data are disposed of at the end of the specified retention periods, in accordance with periodic destruction schedules or upon the request of the data subject, using the determined destruction methods (deletion and/or destruction and/or anonymization).

6.2. Conditions to Process Personal Information

The basis for processing personal data, other than the explicit consent of the data subject, can be based on only one of the conditions specified below, or multiple conditions can also constitute the basis for the same personal data processing activity.

(i) Having Explicit Consent of the Data Subject

One of the conditions for processing personal data is the explicit consent of the data subject. The explicit consent of the data subject must be given in relation to a specific matter, based on being informed and with free will. Personal data may be processed without the need for explicit consent of the data subject if any of the personal data processing conditions listed below are present.

(ii) Explicitly Envisaged in the Laws

If the processing of personal data is explicitly stipulated in the law, in other words, if there is an explicit provision regarding the processing of personal data in the relevant law, then the existence of this condition for data processing can be mentioned.

(iii) Not Having Explicit Consent Due to Actual Impossibility

In cases where it is necessary to process the personal data of the data subject to protect the life or physical integrity of the person who is physically or legally incapable of giving consent, or of another person, the personal data of the data subject can be processed.

(iv) Establishing or Being Directly Related to the Performance of a Contract

If the processing of personal data is necessary for the establishment or performance of a contract to which the data subject is a party, if it is directly related to the contract, this condition can be considered to have been met.

(v) **Fulfilling the Legal Obligations of the Company**

If it is necessary to process the personal data of the data subject for our Company to fulfill its legal obligations, the personal data of the data subject can be processed.

(vi) **Being Public of Personal Data by the Owner Itself**

If the data subject has made their personal data public, the relevant personal data can be processed, limited to the purpose of making it public.

(vii) **Necessity for the Establishment, Exercise, or Protection of a Legal Right**

If the processing of personal data is necessary for the establishment, use, or protection of a legal right, the personal data of the data subject can be processed.

(viii) **Necessity for the Legitimate Interests of Our Company**

This condition stipulates that personal data can be processed if it is necessary for the legitimate interests of our Company if it does not harm the fundamental rights and freedoms of the data subject.

6.3. Process of Special Category Personal Information

Our Company does not collect or process any special category personal data.

6.4. Notice for Data Subject (Data Owner)

Our Company informs personal data subjects, in accordance with Article 10 of the Law and secondary legislation, about who processes their personal data as the data controller, for what purposes, with whom it is shared for those purposes, by what methods it is collected, the legal reason, and the rights that data subjects have within the scope of the processing of their personal data.

6.5. Personal Data Transfer

In line with the lawful personal data processing purposes, our Company takes the necessary security measures and can transfer the personal data and special category personal data of the data subject to third parties (third-party companies, group companies, third real persons). In this regard, our Company acts in accordance with the regulations stipulated in Article 8 of the Law. Detailed information on this subject can be accessed from ANNEX 4 (“ANNEX 4 - Third Parties to Whom Personal Data is Transferred by Our Company and the Purposes of Transfer”) document of this Policy.

6.5.1. Personal Data Transfer

Even without the explicit consent of the personal data subject, if one or several of the conditions specified below are present, our Company will take all necessary security measures, including the methods prescribed by the Board, with due diligence, and personal data can be transferred to third parties:

- The transfer of personal data being explicitly stipulated in the laws,

- The necessity of transferring personal data by the Company for the establishment or performance of a contract, provided that it is directly related and necessary,
- The necessity of transferring personal data for our Company to fulfill its legal obligation,
- The transfer of personal data by our Company, limited to the purpose of making it public, provided that the data subject has made their personal data public,
- The necessity of transferring personal data by the Company for the establishment, exercise, or protection of the rights of the Company, the data subject, or third parties,
- The necessity of transferring personal data for the legitimate interests of the Company, provided that it does not harm the fundamental rights and freedoms of the data subject,
- The necessity of processing personal data to protect the life or physical integrity of the person who is physically or legally incapable of giving consent, or of another person.

In addition to the above, personal data can be transferred to foreign countries declared by the Board to have adequate protection (“Foreign Country with Adequate Protection”) if any of the conditions mentioned above are present. In the absence of adequate protection, personal data can be transferred to foreign countries (“Foreign Country with Data Controller Committing to Adequate Protection”) where data controllers in Türkiye and the relevant foreign country have committed to adequate protection in writing and where the permission of the Board is obtained, in line with the data transfer conditions stipulated in the legislation.

6.6. Special Category Personal Data Transfer

Our Company does not collect or transfer any special category personal data.

7. Categorization of Personal Data Processed by Our Company and Purposes of Processing

Within our Company, in accordance with Article 10 of the Law and secondary legislation, individuals are informed, and personal data are processed in a manner that is compliant with the general principles stated in the Law, especially the principles set forth in Article 4 of the Law concerning the processing of personal data, and based on at least one of the personal data processing conditions specified in Articles 5 and 6 of the Law, limited to and in line with our Company’s personal data processing purposes. Detailed information about the categories of personal data processed and the purposes of processing can be accessed from ANNEX 3 (“ANNEX 3 - Categories of Personal Data”) of this Policy. Detailed information regarding the said personal data processing purposes is included in ANNEX 1 (“ANNEX 1 - Purposes of Personal Data Processing”) of the Policy.

8. Retention and Destruction of Personal Data

Our Company retains personal data for the duration necessary for the purposes for which they are processed and for the minimum period stipulated by the relevant legal legislation. In this context, our Company first determines whether a specific retention period for personal data is set out in the relevant legislation and complies with this period if it is specified. If there is no legal period, personal data are retained for the period necessary for the purposes for which they are processed. Personal data are disposed of at the end of the specified retention periods, in accordance with periodic destruction schedules or upon the request of the data subject, using the determined destruction methods (deletion and/or destruction and/or anonymization).

9. Personal Data Subjects' Rights and the Exercise of These Rights

9.1. Rights of the Personal Data Subject

Personal data subjects have the following rights:

- (1) To learn whether their personal data has been processed,
- (2) To request information if their personal data has been processed,
- (3) To understand the purpose of the data processing and whether personal data are used for intended purposes,
- (4) To know the third parties to whom personal data is transferred domestically or abroad,
- (5) To request the correction of personal data if it is incomplete or inaccurately processed, and to request that the process carried out in this context be notified to the third parties to whom the personal data has been transferred,
- (6) To request the deletion or destruction of personal data if the reasons necessitating their processing cease to exist, despite being processed in accordance with the Law and other relevant legal provisions, and to request that the process carried out in this context be notified to the third parties to whom the personal data has been transferred,
- (7) To request compensation for damages in case of loss due to the unlawful processing of personal data.

Personal data is not processed by automatic means.

9.2. Exercise of the Personal Data Subject's Rights

Personal data subjects can submit their requests regarding the rights listed in section 9.1 ("Rights of the Personal Data Subject") to our Company through the methods specified in the customer information text. Applications for the rights listed above should be conveyed to our Company by filling out the Data Subject Application Form at https://cyberwhiz.co.uk/privacy/Cyberwhiz_data_subject_application_form.pdf via privacy@cyberwhiz.co.uk.

9.3. Our Company's Response to Applications

Our Company takes the necessary administrative and technical measures to conclude the applications made by the personal data subject in accordance with the Law and secondary legislation. If the personal data subject properly submits a request related to the rights listed in section 9.1 ("Rights of the Personal Data Subject") to our Company, our Company will conclude the request free of charge as soon as possible and within a maximum of 30 (thirty) days, depending on the nature of the request. However, if the process requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board.

Annex 1 – Personal Data Processing Purposes

Primary Purposes	Secondary Purposes
Planning and Implementation of the Company's Human Resources Policies and Processes	<ul style="list-style-type: none"> • Planning of Human Resources Processes • Execution of Personnel Recruitment Processes • Planning and Implementation of Intern and Student Placement and Operational Processes
Conducting the necessary work by our relevant business units for the execution of commercial activities carried out by the Company and managing the related business processes.	<ul style="list-style-type: none"> • Event Management • Planning and Execution of Business Activities • Planning and Execution of Supply Chain Management Processes • Planning and Execution of Information Access Rights for Business Partners and Suppliers • Monitoring of Finance and Accounting Affairs • Planning and Execution of Procurement Processes • Planning and Execution of Corporate Communication Activities • Planning and Execution of Corporate Governance Activities • Planning and Execution of Production and Operation Processes • Planning and Execution of Activities for Efficiency/Effectiveness and Appropriateness Analysis of Business Activities • Planning, Auditing, and Execution of Information Security Processes • Planning and Execution of Corporate Sustainability Activities • Planning and Execution of Logistics Activities • Planning and Execution of Business Continuity Activities • Establishment and Management of Information Technology Infrastructure • Planning and Execution of Social Responsibility and Civil Society Activities
Conducting the necessary work by our business units to benefit relevant individuals from the products and services provided by the Company and managing the related business processes.	<ul style="list-style-type: none"> • Planning and Execution of After-Sales Support Services Activities • Monitoring of Contract Processes and Legal Claims • Tracking of Customer Requests and Complaints

	<ul style="list-style-type: none"> • Planning and Execution of Customer Relationship Management Processes • Management of Relationships with Business Partners and Suppliers • Planning and Execution of Sales Processes for Products and Services
Planning and Execution of the Company's Commercial and Business Strategies	<ul style="list-style-type: none"> • Planning and Execution of External Training Activities • Execution of Strategic Planning Activities • Management of Relationships with Business Partners and Suppliers
Customization of the products and services offered by the Company according to the preferences, usage habits, and needs of relevant individuals, and planning and execution of the necessary activities for recommending them to the relevant individuals and promoting the Company.	<ul style="list-style-type: none"> • Planning and Execution of Marketing Processes for Products and Services • Identification and Evaluation of Individuals to be Targeted in Marketing Activities Based on Consumer Behavior Criteria • Planning and Execution of Activities Aimed at Improving and Enhancing the User Experience Related to Products and Services • Designing and Executing Personalized Marketing and Promotion Activities • Planning and Execution of the Company's Production and Operational Risk Processes • Designing and Executing Advertising, Promotion, and Marketing Activities on Digital and Other Platforms • Planning and Execution of Data Analytics Work for Marketing Purposes • Planning and Execution of Customer Satisfaction Activities • Designing and Executing Activities to Acquire Customers and Create Value for Existing Customers on Digital and Other Platforms • Planning and Execution of Market Research Activities for the Sales and Marketing of Products and Services • Planning and Execution of Activities Related to Brand Communication and Reputation • Planning and Execution of Processes to Create and Increase Loyalty to the Products and Services Offered by the Company • Planning and Execution of Business Continuity Activities
Ensuring the Legal, Technical, and Commercial-Business Security of the	<ul style="list-style-type: none"> • Creation and Monitoring of Visitor Records

<p>Company and Relevant Individuals Engaged in Business Relations with the Company</p>	<ul style="list-style-type: none"> • Planning and Execution of Operational Activities Necessary to Ensure the Company's Activities are Conducted in Accordance with Company Procedures and Relevant Legislation • Ensuring the Security of Company Operations • Ensuring the Accuracy and Up-to-dateness of Data • Planning and Execution of the Company's Financial Risk Processes • Planning and Execution of Company Audit Activities • Conducting Corporate and Partnership Law Transactions • Providing Information to Authorized Institutions Arising from Legislation • Monitoring of Legal Affairs • Ensuring the Security of Company Premises and Facilities • Planning and Execution of Occupational Health and Safety Processes • Planning and Execution of Business Continuity Activities • Ensuring, Monitoring, and Executing the Security of Company Assets and Resources • Planning and Execution of Emergency Management Processes
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Annex 2 – Categories of Data Subjects

Categories of Data Subjects	Explanation
Customer	Individuals who have used or are using the products and services provided by our Company within the framework of the contract arranged with the company receiving services from our Company.
Potential Customer	Employees of other companies who have expressed an interest or demand in using our products and services, or who have been assessed as having such interest in accordance with commercial customs and rules of honesty.
Visitor	Individuals who have entered our Company's physical premises for various purposes or visited our websites.
Third Party	To ensure the commercial transaction security between our Company and the aforementioned parties, or to protect the rights and interests of the mentioned individuals, third-party individuals associated with these individuals (e.g., Lawyer, Auditor) or other individuals not covered by this Policy and CYBERWHIZ L.T.D. Employees Personal Data Protection and Processing Policy.
Job Candidate	Individuals who have applied for a job to our Company in any manner or have made their resumes and relevant information available for our Company's review.
Company Shareholder	Company Shareholders
Company Officer	Company Board Members and Other Authorized Individuals
Employees, Shareholders, and Officials of the Institutions We Collaborate With	Individuals, including employees, shareholders, and officials of institutions (such as business partners, solution partners, suppliers, but not limited to these) with which our Company is involved in any kind of business relationship.

Annex 3 – Categories of Personal Data

Categories of Personal Data	Explanation
Identity Information	Personal data that includes identity information: name-surname
Communication Information	Telephone Number, Mobile Phone Number, Address, Email, Fax Number
Customer Information	Information obtained and generated about the relevant individual as a result of our commercial activities and the operations conducted by our business units within this framework.
Potential Customer Information	Information obtained and generated about the relevant individual who may request information regarding our commercial activities and the operations conducted by our business units within this framework.
Customer Transaction Information	Information that is clearly related to an identified or identifiable natural person and included in the data recording system; records related to the use of our products and services, as well as instructions and requests necessary for the customer's use of products and services.
Transaction Security Information	Personal data processed to ensure our technical, administrative, legal, and commercial security while conducting our commercial activities (for example, log records)
Job Candidate Information	Personal data processed regarding individuals who have applied to be an employee of our Company, who have been evaluated as job candidates in line with our Company's human resources needs according to commercial customs and rules of honesty, or who are in a working relationship with our Company.
Request/ Complaint Management Information	Receiving and Evaluating Personal Data Related to All Kinds of Requests or Complaints Directed to Our Company
Audit and Inspection Information	Personal data processed during internal or external audit activities within the scope of our Company's legal obligations and compliance with company policies.
Legal Transaction and Compliance	Legal personal data processed for the determination, tracking of our receivables and rights, performance of our debts, and within

	the scope of our legal obligations and compliance with our Company's policies.
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Annex 4 – Personal Data Transfer Purposes and Third Parties to Whom Personal Data is Transferred by Our Company

Our Company may transfer customers' personal data to the categories of persons listed below in accordance with Articles 8 and 9 of the Law:

- (i) Shareholders
- (ii) Solution Partners
- (iii) Private Legal Entities Authorized by Law
- (iv) Public Institutions and Organizations Authorized by Law
- (v) Company Board Members

The scope of the persons mentioned above to whom the transfer is made, and the purposes of data transfer are specified below.

Persons to Whom Data May Be Transferred	Definition	Purpose of Data Transfer
Company Shareholders	Designing strategies related to our Company's commercial activities and audit activities in accordance with the relevant legislation provisions for company partners.	Designing strategies related to our Company's commercial activities and limited to audit purposes in accordance with the relevant legislation provisions.
Solution Partners	Our company has acquired corporate services that include IT infrastructure from AWS and Microsoft Azure cloud technologies.	Uninterrupted service provision worldwide through the use of IT infrastructure.
Private Legal Entities Authorized by Law	Institutions or organizations established in accordance with certain conditions legally determined by the relevant legislation provisions and continuing their activities within the framework determined by the law (For example, banks, independent auditors).	Personal data is shared on a limited basis regarding the subjects that fall within the scope of the activities carried out by the relevant private institutions and organizations.
Public Institutions and Organizations Authorized by Law	Public institutions and organizations authorized to obtain information and documents from our Company in accordance with the relevant legislation provisions, such as Competition Authority, Personal Data Protection Authority, EDPS	Limited to the purpose requested within the legal authority of the relevant public institutions and organizations.

	(European Data Protection Supervisor)	
Company Board Members	Company Board Members	Limited to the Purpose of Conducting Company Board Activities