

bürotime

**POLICY ON THE PROCESSING
AND PROTECTION OF
PERSONAL DATA**

CONTENTS

I.	INTRODUCTION.....	1
A.	Objective and Scope	1
B.	Definitions.....	1
II.	GENERAL PRINCIPLES AND CONDITIONS RELATED TO PROCESSING OF PERSONAL DATA.....	3
A.	Principles Related to the Processing of Personal Data.....	3
B.	Conditions Related to the Processing of Personal Data	4
C.	Terms and Conditions Related to the Processing of Personal Data	5
D.	Processing of Personal data Collected by the Product or Service Recipient	6
III.	PERSONAL DATA CATEGORIES PROCESSED BY BÜROTIME.....	6
IV.	TRANSFER OF PERSONAL DATA.....	7
A.	Transfer of Personal Data	7
B.	Transfer of Sensitive Personal Data.....	8
V.	ISSUES RELATED TO THE PROTECTION OF PERSONAL DATA	8
VI.	STORAGE AND DESTRUCTION OF PERSONAL DATA	9
VII.	DISCLOSURE TO AND INFORMING THE DATA SUBJECT.....	10
VIII.	RIGHTS OF THE DATA SUBJECT AND EXERCISING SUCH RIGHTS.....	11
IX.	RESPONSE BY BÜROTIME TO THE APPLICATIONS FILED.....	12
X.	ENFORCEMENT OF THE POLICY	12

POLICY ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

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I. INTRODUCTION

A. Objective and Scope

This policy sets out the principles adopted by Bürotime for the protection and processing of personal data.

Within the scope of this Policy, explanation of the activities performed by Bürotime for the processing of personal data and the systems adopted for the protection of personal data, ensuring transparency by informing the Data Subject, in particular those receiving products or services, our Employees and Employee Candidates, our current and potential customers, shareholders, visitors and third parties, establishment and implementation of the standards in the management of personal data, identifying and supporting organizational objectives and obligations, establishment of control mechanisms in line with the acceptable risk level, complying with the rules and principles issued by international conventions, the Constitution, laws, agreements and other legislation on the protection of personal data and protection of the fundamental rights and freedoms of the Related Person in the best manner is aimed. Furthermore, this Policy covers all physical and electronic data recording systems and environments used for the processing of personal and sensitive personal data, whether automated or provided that it is part of any data recording system.

B. Definitions

Definition	Description
Express Consent	The consent about a specific subject based on information and expressed in free will,
The Constitution	The Constitution of the Turkish Republic numbered 2709
Anonymization	Making personal data unlikely to be associated with any identified or identifiable real person in any way even when personal data is paired with other data.
Bürotime	Tosunoğulları Mobilya San. ve Tic. A.Ş
Employee	Bürotime employees
Employee Candidate	Persons who have filed job applications to Bürotime
Data Subject	Real person whose personal data is processed.
Destruction	Deletion, destruction or anonymization of

POLICY ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

	personal data
Personal Data	Any information related to the identity of a specific or identifiable real person.
Personal Data Processing Inventory	Shall refer to the personal data processing inventory where the data controllers explain in detail their data processing activities in accordance with the business processes, the purposes of processing personal data, the data categories, the recipient group to which data is transferred and the maximum period formed by their side after associating with the data subject group and required for the purposes for which the personal data is processed, the personal data anticipated to be transferred to foreign countries as well as the measures taken regarding data security
Anonymization of Personal Data	Anonymization of personal data means making personal data unlikely to be associated with any identifiable real person in any way even when personal data is paired with other data
Destruction of Personal Data	Deletion, anonymization or destruction of Personal Data
Deletion of personal data	Refers to the process of making personal data inaccessible to and not reusable by the users concerned.
Removal of Personal Data	The irreversible process of destructing personal data and making it inaccessible to and not reusable by anybody.
Committee	Bürotime Personal Data Protection Committee
Personal Data Protection Board	Personal Data Protection Board
LPPD	Law on the Protection of Personal Data No. 6698
Sensitive Personal Data	Data about the race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, appearance and clothing, membership to an association, foundation or trade union, medical condition, sexual life, criminal conviction and security measures as well as biometric and genetic data of persons
Periodic Destruction	Shall refer to the process of erasing, destroying or anonymizing the personal data stored in the personal data storage and

POLICY ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

	destruction policy in the event that all of the processing conditions of the personal data under the LPPD are removed.
Policy	Bürotime Policy on The Processing and Protection of Personal Data
Product or Service Recipient	Real persons or legal entities acting as Dealers, Franchisees, Sub-Franchisees that have a contractual relationship with Bürotime
Data Processor	The real person or the legal entity who processes personal data on behalf of the data officer based on the authority vested to it by the same.
Data Recording System	The recording system where personal data is processed by means of structuring according to certain criteria,
Data Controller	Refers to real person or legal entity responsible for establishing and managing the data recording system that specifies the objectives and means of processing personal data,

II. GENERAL PRINCIPLES AND CONDITIONS RELATED TO PROCESSING OF PERSONAL DATA

Bürotime, in accordance with Article 20 of the Constitution and Article 4 of the LPPD, engages in personal data processing in a limited and modular manner in accordance with the rules of law and honesty, in an accurate and updated manner if required and with specific, clear and legitimate purposes in connection with the objective. In this scope, pursuant to Article 5 of the Constitution and Article 5 of the LPPD, Bürotime processes personal data on the basis of one or more requirements under Article 5 of the LPPD regarding the processing of personal data and maintains the personal data as long as the period required by the processing of personal data and/or set forth by the law. In addition, it acts in compliance with the regulations stipulated under Article 6 of the LPPD in terms of processing of sensitive personal data and acts in accordance with the regulations set forth under the law and laid down by the PDP Board as per Articles 8 and 9 of the LPPD and pursuant to Article 10 of the LPPD, it discloses to the Data Subject and provides the necessary information if the Data Subject requests any information.

A. Principles Related to the Processing of Personal Data

Your personal data is processed by **Bürotime** in accordance with the personal data processing principles stated in article 4 of the LPPD. It is obligatory to abide by these principles for each personal data processing activity:

POLICY ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

Processing of personal data in accordance with the law and rules of integrity,

In the processing of your personal data, Bürotime acts in accordance with the laws, secondary regulations and general principles of law and attention is paid to take into account the reasonable expectations of the Data Subject as well as to process the personal data limited to the intention of such processing.

Accurate and updated personal data:

It is observed to ensure that your processed personal data is up-to-date and that all relevant controls are made. The Data Subject is vested with the right to request the correction or deletion of incorrect and outdated data.

Processing of personal data for specific, clear and legitimate purposes:

The purposes of data processing are determined before each personal data processing activity and it is ensured that these purposes are in compliance with the law.

The personal data should be related to, limited with and proportionate to the purposes of being processed:

The personal data required to accomplish the purpose of data processing activities shall be limited and technical and administrative measures are taken to prevent the processing of personal data that is not related to such purpose.

Retention of personal data for as long as required by the legislation or the purpose of processing:

Personal data is deleted, destroyed or anonymized after the purpose of processing of personal data has been removed or after the expiry of the period stipulated under the legislation.

B. Conditions Related to the Processing of Personal Data

Your personal data is processed by **Bürotime** in the presence of at least one of the personal data processing conditions stated in article 5 of the LPPD.

The explanations regarding such conditions are as follows:

Express Consent of the Data Subject:

The personal data of the Data Subject can be processed with its free will and with sufficient knowledge of the personal data processing activity, in a manner without any hesitation and only upon limited consent.

Explicit prescription by law:

Personal data may be processed in accordance with the relevant legal regulation without the Express Consent of the Data Subject, if explicitly set forth by the law.

Inability to obtain the express consent of the Data Subject due to impossibility de facto and the processing of personal data is obligatory:

POLICY ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

The personal data of the Data Subject who is in a condition not being able to disclose the consent or whose consent shall not be deemed valid may be processed if it is compulsory to process the personal data in order to protect the life or bodily integrity of the person himself/herself or of someone else without seeking for Express Consent.

Transfer of personal data is directly relevant and necessary for the establishment or execution of an agreement,

If it is necessary to process personal data belonging to the parties of the contract established or signed by and between the Data Subject and **Bürotime**, personal data processing may be performed without seeking an Express Consent.

Conduct of a personal data processing activity is obligatory for the Data Controller to perform its legal obligation:

Personal data may be processed without seeking explicit consent in order to fulfill the legal obligations stipulated under the legislation in force.

The Data Subject having publicized its personal data:

Personal data, which has been disclosed to the public in any way by the Data Subject and made available to everyone as the result of being publicized, may be processed in a limited manner without the express consent of the Data Subject for the purpose of being publicized.

Processing of personal data is mandatory for the establishment, exercise or protection of a right:

If data processing is compulsory for the establishment, exercise or protection of a right, the Data Subject's personal data may be processed.

Data processing is obligatory for the legitimate interests of the data controller, provided that the basic rights and freedom of the Data Subject are not damaged:

Personal data can be processed provided that the balance of interest of the Data Subject is observed. In this context, based on the legitimate interest, the legitimate interest that **Bürotime** will obtain as the result of the processing activity shall be determined in the first place based on the processing of the data. The possible impact of the processing of personal data on the rights and freedoms of the Data Subject will be assessed and if it is considered that the balance is not impaired, the processing may be carried out without seeking any express consent.

C. Terms and Conditions Related to the Processing of Personal Data

Sensitive personal data has been stated in article 6 of the LPPD in limited quantity. This is the data about the race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, appearance and clothing, membership to an association, foundation or trade union,

POLICY ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

medical condition, sexual life, criminal conviction and security measures as well as biometric and genetic data of persons.

Bürotime can process sensitive personal data by providing additional measures determined by the PDP Board in the following cases:

Processing of Sensitive Personal Data Except for Health and Sexual Life:

In the case Express Consent is given by the Data Subject or if it is explicitly provided for in the law, data may be processed without seeking the Express Consent of the Data Subject.

Personal data on health and sexual life:

Data may be processed by any person or authorized public institutions and organizations that have confidentiality obligation, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing if explicit consent is provided by the Data Subject.

D. Processing of Personal data Collected by the Product or Service Recipient

Bürotime enters into a contractual relationship with the Product or Service Recipient within the scope of its activities and carries out its product sales and after-sales service through these persons. In this context, the personal data of a significant portion of **Bürotime** end customers are obtained from the Data Subject through the Product or Service Recipient by means of fulfilling the obligation of disclosure and transferred to **Bürotime**. This data can be processed both by **Bürotime** and the Product or Service Recipient in order to carry out the business. In the case the relationship between **Bürotime** and the Product or Service Recipient takes place in the form of "personal data transfer from the data processor to the data controller" under the LPPD, the relevant product or service recipient will disclose to the Data Subject regarding the issue that such personal data could be sent to **Bürotime** at the stage of collecting the personal data. **Bürotime** evaluates the activities for the collection of personal data on its behalf and inspects the Product or Service Recipient in this respect and ensures that the contracts prepared in accordance with Article 10 of the LPPD, regulating the rights and obligations of the parties are signed.

III. PERSONAL DATA CATEGORIES PROCESSED BY BÜROTIME

The personal data of the Data Subject including the identity, signature, title, legal transaction, communication, license plate, finance, customer transaction, card, philosophical belief, religion, sect and other beliefs, personal information, professional experience, health information, other information, criminal conviction and security measures, union membership, association membership, political opinion information, photography, duty, physical space security, marketing, location, visual and audial, process security and occupational categories shall be processed by Bürotime in accordance with LPPD and other

POLICY ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

relevant legislation within the scope of the objective and conditions stipulated under this Policy.

IV. TRANSFER OF PERSONAL DATA

Bürotime may transfer personal data and personal data of special nature of the Data Subject to real persons and legal entities, shareholders, suppliers and authorized public institutions and organizations as well as to other authorities by taking the required security measures pursuant to the personal data processing purposes in accordance with the law. In this respect, **Bürotime** acts in accordance with the regulations stipulated in Article 8 of the LPPD.

A. Transfer of Personal Data

Even if the Data Subject does not have an express consent, if one or more of the following conditions exist, the personal data may be transferred to third parties with due diligence shown by **Bürotime** and by means of taking all necessary security measures including the methods prescribed by the PDP Board:

- The relevant activities concerning the transfer of personal data are clearly prescribed by the law,
- The existence of an obligation to protect the life or bodily integrity of the person who cannot explain his/her consent due to actual impossibility or whose consent is not deemed valid in legal terms.
- Transfer of personal data is directly relevant and necessary for the establishment or execution of an agreement,
- Transfer of personal data is obligatory to fulfill a legal obligation,
- The transfer of personal data in a limited manner for the purpose of publicity, provided that it has been publicized by the Data Subject,
- The transfer of personal data is obligatory to establish, exercise or protect the rights of **Bürotime**, the Data Subject or third parties.
- Transfer of personal data is obligatory to fulfill the legal interests of **Bürotime** provided that the fundamental rights and freedom of the Data Subject.

In addition to the above listed, personal data may be transferred to foreign countries stated to have adequate protection by the PDP Board in the presence of any of the above conditions. In the case no adequate protection is available, personal data shall be transferred to foreign countries that have been announced by the PDP Board to have adequate protection or in the absence of an adequate protection, to the foreign countries allowed by the PDP Board and

POLICY ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

where an adequate protection has been undertaken in written form by the data controllers Both in Turkey and in the relevant foreign country.

B. Transfer of Sensitive Personal Data

Sensitive personal data can be transferred by **Bürotime** in accordance with the principles set forth under this Policy and by taking all necessary administrative and technical measures including the methods to be defined by the PDP Board and only in the presence of the following conditions.

- Sensitive personal data except for health and sexual life may be processed without the Express Consent of the Data Subject if explicitly set forth by the law, in another saying if there is an explicit provision in the relevant law related to the processing of personal data. Otherwise, the express consent of the Data Subject shall be obtained.
- Special personal data relating to health and sexual life may be processed by any person or authorized public institutions and organizations that have confidentiality obligation, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing without the need for explicit consent. Otherwise, the express consent of the Data Subject shall be obtained.

In addition to the above listed, personal data may be transferred to foreign countries stated to have adequate protection in the presence of any of the above conditions. If there is not adequate protection, the data can be transferred to foreign countries where the Data Controller/Data Processor is committed to provide adequate protection in accordance with the data transfer conditions stipulated in the legislation.

V. ISSUES RELATED TO THE PROTECTION OF PERSONAL DATA

Bürotime, in accordance with Article 12 of the LPPD, takes the necessary technical and administrative measures to ensure that the appropriate level of security is maintained so as to prevent illegal processing of personal data, to prevent illegal access to data, as well as to ensure data retention and within this scope, it performs the required inspections or has these inspections done.

The data protection principles adopted by **Bürotime** include the following:

- Providing clear information to individuals about by whom and how their personal data is used,
- In line with these purposes, processing of personal data at a required minimum level and not processing personal data more than necessary provided that no damage is caused on the fundamental rights and freedoms of persons.

POLICY ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

- Respecting the rights of the Data Subject regarding its personal data, including the right to access,
- To keep the category inventory of the personal data processed,
- To keep the personal data accurate and up-to-date,
- Processing of personal data in an equitable and lawful manner,
- Processing personal data only if it is clearly required for legitimate corporate objectives,
- Storage of personal data only in accordance with the statutory regulations, legal obligations of **Bürotime** or pursuant to time limits specified in the **Bürotime** Personal Data Storage and Destruction Policy and required by the legitimate corporate interests of the same.
- Transferring personal data abroad within the framework of the principles determined by the LPPD,
- Establishing a Committee formed by Employees with special authorities and responsibilities related to the protection of the personal data system,
- Implementing the exceptions allowed as per the legislation,
- Preparation of this Policy,
- Taking the necessary technical and administrative measures determined by the LPPD and the secondary legislation, as well as the PDP Board to ensure the appropriate level of security of the personal data,
- Processing only relevant and appropriate personal data.

VI. STORAGE AND DESTRUCTION OF PERSONAL DATA

Bürotime maintains personal data in accordance with the period required for the purpose of processing such data and the minimum periods required by the legislation which the relevant activity is subject to. In this context, it will firstly be determined whether any period has been stipulated or not in the relevant legislation to keep the personal data and if a period of time has been specified for such purpose, one should act in accordance with this period. If no period of time has been specified under the legislation, personal data will be maintained for the time required regarding the purpose for which such data is being processed. Personal data is will be destructed at the end of the designated retention periods in accordance with the periodic destruction times specified in the **Bürotime** Personal Data Storage and Destruction

POLICY ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

Policy or pursuant to the application of the Data Subject using the determined destruction methods (deletion and/or removal and/or anonymization).

For more information, please refer to the **Bürotime** Personal Data Storage and Destruction Policy www.burotime.com/en/privacy-and-security

DISCLOSURE TO AND INFORMING THE DATA SUBJECT

Bürotime discloses to the Data Subject in accordance with Article 10 of the LPPD. In this context, if the personal data is obtained from the Data Subject itself, then during that obtaining process; if it is not obtained from the Data Subject, then within a reasonable period of time from the receipt of such personal data however, in any case, regardless of the request of the Data Subject, the following shall be disclosed to the Data Subject:

- Identity of **Bürotime**,
- For what purpose the personal data is to be processed,
- To whom and for what purpose such processed personal data shall be transferred,
- The method to collect personal data (entirely or partially automatic methods or acquired by non-automatic means provided that it is be a part of any data recording system),
- Which legal grounds the personal data collection is based on,
- The other rights of the Data Subject listed in Article 11 of the LPPD.

It should be ensured that the disclosure in question includes the rights of the Data Subject as envisaged in the LPPD and under this Policy in addition to those listed above. The matters below will be taken into account during disclosure:

- The information within the scope of disclosure is provided using a clear and simple language. For other purposes which are likely to come up in the future, statements which suggest that relevant personal data may be processed may not be used.
- Disclosure can be performed through various physical or electronic means over the call center via verbal, written means and voice recording and it can be directed to the web page containing the personal data disclosure texts and other platforms that can be announced later. The relevant department, fulfilling the obligation of disclosure and performing the information activity shall take the necessary measures to prove this in a manner complying with the law and the procedures.

POLICY ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

- If the purpose of processing the data specified in the disclosure changes while obtaining a personal data, the disclosure obligation for this new purpose will be fulfilled separately in accordance with the procedures set forth above.
- If the personal data obtained is only to be used for the purpose of communicating with the Data Subject, the disclosure may take place during the establishment of the first communication.
- If the personal data obtained is to be transferred to third parties, attention is paid to ensure that the disclosure is performed at the latest when the personal data is to be transferred for the first time.

VII. RIGHTS OF THE DATA SUBJECT AND EXERCISING SUCH RIGHTS

The statutory rights that may be exercised by the Data Subject with regard to personal data are listed below:

- Learning whether the personal data has been processed or not,
- If the personal data has been processed, to request personal data accordingly,
- To learn the purpose of processing the personal data and whether they are used appropriately in accordance with this purpose,
- To have information about third parties to whom personal data will be transferred either in Turkey or abroad,
- To request the correction of personal data if it is incomplete or improperly processed and to request that the process carried out in this context be notified to third parties to whom personal data is transferred,
- To request that personal data be deleted, destroyed or anonymized even if it has been processed in accordance with the provisions of the law and other relevant laws and in the case that the reasons for such processing are not present any more to request that the process carried out in this context be notified to third parties,
- To object to the occurrence of a result against the person himself by means of analyzing the processed data exclusively through automated systems,
- To demand that damages be covered in the event of suffering losses due to the processing of personal data contrary to the law.

The Data Subject will be able to communicate its requests related to its rights listed under this article to **Bürotime** by filling in the **Bürotime** Application Form in writing or by means of a Registered Electronic Mail (KEP), Secure Electronic Signature, Mobile Signature or by using

POLICY ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

the electronic mail address registered in our system and which was informed before provided that such request is placed in Turkish language as per the Communiqué on the Procedures and Principles for the Application to the Data Controller numbered 30356.

VIII. RESPONSE BY BÜROTIME TO THE APPLICATIONS FILED

Bürotime takes all required administrative and technical measures in order to finalize the applications to be filed by the Data Subject in an effective manner and in compliance with the law and rules of integrity.

The applications of the Data Subject may be accepted, whereas they may be rejected by stating the grounds. The response to the application of the Data Subject may be communicated to the Data Subject in written form or in electronic environment.

In the case the Data Subject duly communicates to **Bürotime** its request related to the rights contained under the Policy with the title The Rights of the Data Subject and Exercise of Such Rights in accordance with the mentioned procedures, such request shall be finalized free of charge in the shortest time and within 30 (thirty) days at the latest depending on the nature of the request. However, if the transaction requires a respective cost and the conditions stipulated by the Personal Data Protection Board are covered, the fee in the tariff will be charged.

IX. ENFORCEMENT OF THE POLICY

This Policy, set out by **Bürotime**, has entered into force on date 28.04.2020 and in the case the entire Policy or certain articles are renewed, necessary updates will be made.

This Policy will be implemented, updated and announced by the Committee.

The policy will be published on the **Bürotime** website (www.burotime.com/en/privacy-and-security)