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Opet Fuchs Madeni Yağ Sanayi ve Ticaret A.Ş. Personal Data Protection Policy

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1. Purpose and Scope

Personal Data Protection Policy of Opet Fuchs, which constitute a part of Ethical Principles of Opet Fuchs (the “**Policy**”), aims to determine the framework of and to coordinate the compliance activities to be carried out specifically for Opet Fuchs in order to comply with the Legislation on the protection and processing of personal data. In this context, as Opet Fuchs, the aim is to ensure that personal data processing activities are carried out in accordance with the principles of legality, honesty and transparency.

Employees and managers of Opet Fuchs are obliged to comply with this policy. Business partners are also expected to comply with the procedures and principles of this Policy to the extent applicable to the relevant transactions.

2. Definitions

“**Anonymization**” refers to making personal data incapable of being associated with an identified or identifiable natural person under any circumstances, including being associated with other data.

“**Business Partners**” include Suppliers, vendors and all kinds of representatives, subcontractors and consultants acting on behalf of the company.

“**Concerned Person**” refers to a real person, whose personal data is processed (customers, visitors, employees and candidate employees, etc.).

“**Data Manager**” refers to a real or legal person responsible for the establishment and management of a data recording system that determines the purposes and means of processing personal data.

“**Data Processor**” refers to a real or legal person who processes personal data on behalf of the Data Manager based on the authority granted by the Data Manager.

“**Explicit Consent**” refers to the consent that is based on being-informed and that is freely-expressed regarding a certain subject.

“**Legislation**” refers to all of the relevant applicable legislation both in Turkey and other related countries regarding the protection of personal data, in particular the Law on the Protection of Personal Data Numbered 6698.

“**Main Shareholders**” means OPET Petrolcülük A.Ş and Fuchs Petrolub SE, the main shareholders of Opet Fuchs.

"Opet Fuchs" refers to Opet Fuchs Madeni Yağ Sanayi ve Ticaret A.Ş.

"Personal Data" refers to all information about a real person, whose identity is certain or can be ascertained.

"Processing of Personal Data" refers to all kinds of transactions carried out on data such as obtaining, recording, storing, preserving, modifying, re-modifying, disclosing, transferring, taking over, making accessible, classifying or preventing the use of personal data fully or partially automatically or by non-automatic means, provided that it is a part of any data recording system.

"Sensitive Personal Data" refer to the data related to race, ethnicity, political thought, philosophical belief, religion, denomination or other beliefs, clothing, membership of association, foundation or union, health, sexual life, criminal conviction and security measures, biometric data and genetic data.

"VERBIS" refers to Data Managers Registry Information System.

3. General Principles

Violation of this Policy may result in severe adverse consequences for Opet Fuchs, its related managers and employees, including legal, administrative and criminal sanctions depending on the Legislation applicable in the region where they conduct their activities, and most importantly, may cause serious damage to the reputation of Opet Fuchs.

One of the most important issues for Opet Fuchs is to comply with the Legislation and the general principles stipulated in the Legislation during the processing of personal data. In this context, Opet Fuchs is expected to act in accordance with the principles listed below during the processing of personal data in accordance with the Legislation.

Opet Fuchs carries out the processing of personal data within the scope of its activities in accordance with the Personal Data Protection and Processing Policy of Opet Fuchs¹.

3.1. Engaging in Personal Data Processing Activities in Accordance with the Law and the Rules of Honesty

The processing of personal data shall be carried out in compliance with the Legislation and in accordance with the general rules of trust and honesty. In this context, personal

¹ Detailed information can be obtained by visiting the following address:https://www.opetfuchs.com.tr/Content/pdf/OF.KVK.001_1.pdf.

data shall be processed in accordance with general legal principles, goodwill and general morality, to the extent required by and limited to business activities.

3.2. Ensuring Personal Data's Accuracy and Being Up-To-Date When Necessary

It shall be ensured that the personal data, processed by taking into account the fundamental rights of the concerned persons, are accurate and up-to-date, and accordingly, systems shall be established to ensure these by taking necessary measures.

3.3. Processing (Personal Data) For Specific, Express and Legitimate Purposes

Personal data shall be processed for legitimate and lawful reasons. Opet Fuchs shall process personal data in connection with its activities and to the extent necessary. The purpose for which personal data will be processed shall be determined before the personal data processing activity starts.

3.4. Personal Data's Being Linked, Limited and Parallel with the Purpose of Processing

Personal data shall be processed in such a way that it is suitable for the fulfilment of the determined purposes, and the processing of personal data that is not needed for the fulfilment of the determined purpose shall be avoided.

3.5. Retention Of the Personal Data For The Period Stipulated In The Relevant Legislation Or For A Period Required For The Purpose For Which They Are Processed

Personal data shall be retained only for the period stipulated in the relevant Legislation or required by the purpose of processing personal data.

In this context, first of all, it shall be determined whether a certain period is provided for the storage of personal data in the relevant Legislation, if any period has been determined, it shall be adhered to and if no period has been determined then, personal

data shall be stored for the period necessary for the fulfilment of the purpose of processing personal data. Personal data shall be deleted, destroyed or anonymized at the expiration of the relevant period or when the reasons for the processing of personal data disappear. Personal data shall not be stored with the possibility of using it in the future.

4. Implementation of the Policy

4.1. Processing Of Personal Data In Accordance With The Data Processing Conditions

4.1.1. Carrying Out Personal Data Processing Activities Based on the Personal Data Processing Conditions Determined in the Legislation

As a rule, personal data shall be processed in accordance with at least one of the conditions specified in the Legislation. It shall be determined whether the personal data processing activities carried out by the company departments are carried out based on at least one of these conditions, and personal data processing activities that do not meet this requirement shall not be included in the processes.

4.1.2. Carrying Out Sensitive Personal Data Processing Activities Based on Sensitive Personal Data Processing Conditions Determined in the Legislation

As a rule, sensitive personal data shall be processed in accordance with the conditions specified in the Legislation. It shall be ensured that the sensitive personal data processing activities, which are carried out by the company departments, are carried out in accordance with these conditions, and it shall be ensured that the administrative and

technical measures to be taken regarding the processing of sensitive personal data and the following conditions are present:

- (i) **Sensitive Personal Data apart from Health-Related and Sex-Related Data** can be processed without seeking any explicit consents of the concerned person in case it is clearly prescribed in the laws and -in other words- in case there is an expressly-mentioned provision in the laws regarding processing personal data. Otherwise, explicit consent of the concerned person shall be needed.
- (ii) **Sensitive Personal Data apart from Health-Related and Sex-Related Data** can be processed without seeking any explicit consent from the authorized organizations and institutions or from the persons subjected to confidentiality obligations for the purpose of maintaining public health, for the conduct of preventive

medicine services, medical diagnosis services, treatment and care services, for planning and managing health-related services and related financial issues. Otherwise, explicit consent of the concerned person shall be needed.

Sensitive personal data processing activities shall be carried out by taking into account the regulations stipulated in the Legislation regarding the processing of sensitive personal data and transfer of sensitive personal data to third parties, located both within the borders of the country and abroad; Personal data processing activities shall be carried out by fulfilling the special requirements sought by the Legislation in these cases, in addition to the above-mentioned issues.

4.2. Rules To Be Followed In The Transfer Of Personal Data

The personal data of the concerned person shall be transferred to third parties in accordance with the purposes of personal data processing and legal reasons and after taking the necessary security measures. In this direction, necessary processes shall be designed to act in accordance with the conditions stipulated in the Legislation.

4.3. Obligations Related To The Protection And Processing Of Personal Data

4.3.1. Obligation to Register with VERBIS

Opet Fuchs, which is obliged to register with VERBIS according to the criteria determined in the legislation, shall register with VERBIS as a Data Manager. In case of a change in the registered information, the information shall be updated in VERBIS within seven days from the date of the change.

A report regarding the updates made by Opet Fuchs in VERBIS shall be submitted to Legal and Compliance Consultancy Department of Koç Holding by the Assistant General Manager (Finance & Compliance) and/or the Management Systems, Risk and Compliance Department twice a year in 6 months periods (June-December).

4.3.2. Obligation to Inform the Concerned Persons

During the acquisition of personal data, the concerned persons shall be informed in accordance with the Legislation.

In this context, personal data collection channels shall be determined by Opet Fuchs in order to fulfil its obligation of disclosure; concerned persons shall be informed through the clarification texts that contain the scope and conditions stipulated in the Legislation specific to these data collection activities, and appropriate processes shall be designed.

Personal data collection channels shall be kept up-to-date in a list by the company and shall be shared with Legal and Compliance Consultancy Department of Koç Holding by the Assistant General Manager (Finance & Compliance) and/or the Management Systems, Risk and Compliance Department twice a year in 6-month periods (June-December).

4.3.3. Obligation to Ensure the Security of Personal Data

Being aware of the importance of the rule that data security shall be ensured in every aspect within Opet Fuchs, appropriate and necessary technical and administrative measures shall be taken to prevent the unlawful processing of the processed personal data or unlawful access to these data, and to ensure that the data is kept in accordance with the law; within this context, the necessary audits shall be carried out by the company and/or by a third party hired by the company.

Within the scope of the measures, trainings regarding the Legislation shall be given to the employees by the company. The Assistant General Manager (Finance & Compliance) and/or the Management Systems, Risk and Compliance Department shall inform the Legal and Compliance Consultancy Department of Koç Holding about the trainings provided within this scope.

4.3.4. Auditing the Measures Taken on the Protection of Personal Data

In terms of the technical and administrative measures taken, systems shall be designed to carry out and have the necessary inspections conducted in relation to the functioning of the measures. The results of this audit shall be reported by the Management Systems, Risk and Compliance Directorate to the Assistant General Manager (Finance & Compliance) and the necessary activities shall be carried out to improve the measures taken. In addition, the audit report prepared annually by the company and the measures taken shall be reported to the Legal and Compliance Consultancy Department of Koç Holding.

4.3.5. Measures to be Taken in Case of Unauthorized Disclosure of Personal Data

In the event that processed personal data is obtained by others through illegal means, this shall be reported to the concerned person as soon as possible and to the relevant authorities in accordance with the Legislation. In this context, the necessary internal structure, in which the Assistant General Manager (Finance & Compliance) and the Management Systems, Risk and Compliance Directorate take place, shall be created. In addition, in such cases, Legal and Compliance Consultancy Department of Koç Holding shall be informed immediately.

4.3.6. Obligation to Inform the Concerned Person

The concerned persons have the right to request information regarding their personal data by applying to the data managers when necessary.

In this context, procedures and processes for designing the necessary application channels in accordance with the Legislation, evaluating the applications, responding to the applications within the time limits stipulated in the Legislation, shall be established and implemented within the body of company in order to evaluate the rights of the concerned persons and to provide the necessary information to the concerned persons.

In the event that the concerned persons submit their requests regarding their rights to the company, the relevant request shall be concluded as soon as possible and within thirty days at the latest.

When concluding the relevant application, information shall be provided in a language and format that the person can understand. Necessary warnings shall be made within the company and awareness shall be raised that the concerned person has the right to file a complaint with the relevant authority in cases where the application is rejected, the response is insufficient, or the application is not answered within the period.

Applications by the concerned persons and the response process shall be kept in list by the company and shall be shared with Legal and Compliance Consultancy Department of Koç Holding by the Assistant General Manager (Finance & Compliance) and/or the Management Systems, Risk and Compliance Department twice a year in 6-month periods (June-December). In addition, the opinion of the Assistant General Manager (Finance & Compliance) and/or the Management Systems, Risk and Compliance Department and the Legal and Compliance Consultancy Department of Koç Holding shall be obtained before any action is taken regarding any information and document request from the relevant authorities and any application to be made by the company to these authorities.

5. Authority and Responsibilities

All employees and managers of Opet Fuchs are obliged to comply with this policy. Opet Fuchs expects all its Business Partners to comply with this Policy to the extent applicable to the relevant party and the transaction and takes the necessary steps to ensure this.

The Management Systems, Risk and Compliance Directorate shall be responsible for the execution of this Policy.

In case of being aware of any action that is believed to be in violation of this Policy, applicable Legislation or the Ethical Principles of Opet Fuchs and Main Shareholders, the Assistant General Manager (Finance & Compliance) and/or the Management Systems, Risk and Compliance Department of Opet Fuchs or the Legal and Compliance Consultancy Department of Koç Holding can be contacted.

Please contact the department or persons mentioned above with respect to your questions or issues that you are in hesitation. If you are an Opet Fuchs employee, you can share your notices and notifications with the Assistant General Manager (Finance & Compliance) via "ihbar.opetfuchs.com.tr". If you are not an Opet Fuchs employee then, you may forward your notices and notifications to uyum@opetfuchs.com.tr. Alternatively, you can also submit your notifications and statements through Koç Holding Ethics Line "[koc.com.tr/ihbarbildirim](https://www.koc.com.tr/ihbarbildirim)" or Fuchs Report Line <https://www.bkms-system.net/FUCHS-Compliance-Communication>.

Violation of this policy may result in significant disciplinary punishments, including dismissal. In case of violation of this Policy by third parties, legal relationship between these parties and Opet Fuchs may be terminated immediately.

6. Revision History

This policy shall enter into force as of the 01/12/2021 and the Management Systems, Risk and Compliance Department shall be responsible for the execution of this Policy.

Revision	Date	Explanation