

**NUROL CONTROLS VE AVIONICS SYSTEMS
INC.
POLICY ON THE PROTECTION AND
PROCESSING OF PERSONAL DATA**

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AVIONICS SYSTEMS INC.**

1. SECTION 1 – INTRODUCTION

1.1. INTRODUCTION

The protection of personal data is one of the top priorities of Nurol Controls and Avionics Systems Inc. (“**Company**” or “**NUROLCAS**”), which acts with utmost diligence to comply with all existing legislation related to this issue. One of the most important pillars in this regard is the Policy for the Protection and Processing of the Personal Data of Nurol Controls and Avionics Systems Inc. (“**Policy**”).

This Policy describes the approach adopted by the Company to the processing of personal data, as well as the fundamental principles adopted to ensure the conformity of the Company’s data processing activities with the regulations/provisions stipulated in Personal Data Protection Law Number 6698 (“**Law**”), ensuring the necessary transparency within the Company in informing the owners of personal data. With full awareness of our responsibility in this regard, your personal data is processed and protected in accordance with this Policy.

1.2. SCOPE

This Policy relates to all personal data of persons other than our Company’s employees, which may be processed automatically or manually if part of a data logging system.

Detailed information on the owners of the personal data in question can be found in Annex-1 (“**Annex 1 - Owners of Personal Data**”) to this Policy.

The activities carried out by our Company to protect the personal data of our employees are managed in accordance with Nurol Controls and Avionics Systems Inc.’s Policy for the Protection and Processing of Employees’ Personal Data, drafted in line with the principles of this Policy.

2. SECTION 2 – GENERAL POINTS PERTAINING TO THE PROCESSING OF PERSONAL DATA

2.1 Processing of Data in accordance with the Principles Envisaged in the Legislation

2.1.1. Processing of Data in accordance with the Law and the Principle of Good Faith

The personal data of individuals is processed in accordance with the principles of trust and good faith, in a manner that ensures that the fundamental rights and freedoms of the personal data owners are not harmed in any way. Accordingly, personal data is processed only to the extent required by, and limited to, our Company’s business activities.

2.1.2. Ensuring that Personal Data is Accurate and Up-to-date when Necessary

Our Company takes the necessary measures to ensure that personal data remains accurate and up-to-date while being processed, and establishes the necessary mechanisms to ensure the accuracy and currency of personal data at certain time intervals.

2.1.3. Processing Data for Well-Defined, Explicit and Legitimate Purposes

Our Company clearly sets out its intentions in processing personal data, and processes such data solely for purposes associated with its business activities.

2.1.4. Processing Data in a Manner that is Relevant, Limited and Measured to the Stated Purpose of Processing

Our Company collects only the type of personal data that is required for its business activities, and only to the extent that is warranted by these activities. The processing of the data also remains limited to the stated purposes.

2.1.5. Periods Envisaged in Relevant Legislation that are Required for the Purpose of Processing Safekeeping of Data

Our Company stores personal data for as long as required, and for the purpose for which it has been processed, and in accordance with the minimum time periods defined in legislation. Accordingly, our Company first determines whether a specific time period is specified in legislation for the storage of personal data, and acts accordingly if such a time period is defined. If no legally defined time period is available, the personal data is kept for as long as it is necessary, in accordance with the purpose for which it has been processed. Personal data will be destroyed in accordance with pre-defined methods (deletion and/or disposal and/or anonymization) at the end of its storage period, or at periodic times for designated data destruction, or upon the application/request of the data owner.

2.2 CONDITIONS FOR THE PROCESSING OF PERSONAL DATA

Explicit consent by the owner of personal data constitutes only one of the legal grounds for the processing of personal data, in compliance with the law. Should any of the conditions listed below apply, personal data may be processed by our Company without having to obtain the explicit consent of the owner of the personal data.

Any one of the conditions listed below other than explicit consent can serve as a basis for the processing of personal data, although more than one of these conditions may serve as the basis for the processing of the same personal data. In the event of the data to be processed being private personal data, the conditions listed within Section 2.3 ("***Processing of Special Category Personal Data***") of this Policy shall apply.

2.2.1 Explicitly Envisaged in the Laws

If explicitly required by the law, in other words, should the law contain an explicit provision relating to the processing of personal data, the personal data of the data owner may be processed by our Company to the extent permitted by legislation.

2.2.2 Impossibility of Obtaining Explicit Consent

The processing of the personal data of the data owner is permitted in cases where it becomes obligatory to process the personal data of a person who is incapable of expressing consent, or whose consent lacks validity, in order to protect the life or physical integrity of this person or someone else.

2.2.3 Direct Relationship with the Conclusion and Execution of a Contract

If personal data is required to be processed, this condition may be deemed to have been fulfilled provided that a contract to which the data owner is a party is concluded, or is directly related to its execution.

2.2.4 Company Fulfills a Legal Obligation

Our Company may process the personal data of the data owner if the processing of such data is required for the fulfillment of its legal obligations.

2.2.5 Personal Data of Data Owner Having Been Made Public

In the event of the data owner having publicly shared their personal data, the relevant personal data can be processed to the extent that they have been made public.

2.2.6 Processing of Data is Required to Ensure or Protect a Certain Right

The personal data of the data owner may also be processed should it be required to establish, exercise or protect a certain right.

2.2.7 Mandatory Processing of Data for the Legitimate Interests of Our Company

On the condition that the fundamental rights and freedoms of the data owner are not infringed, our Company may process the personal data of the data owner should such data processing being required to serve the legitimate interests of our Company.

2.3 Processing of Private Personal Data

The Law attaches particular importance to sensitive personal data, since the illegal processing of such data can carry the risk of causing unjust harm or discrimination to persons. Such “private” personal data includes information on race, ethnic origin, political views, philosophical beliefs, religion, sect and other beliefs, clothing and appearance, membership of associations, foundations or labor unions, health, sexual life, criminal history and security measures, as well as biometric and genetic data.

In line with the principles of this Policy, and taking any necessary administrative and technical measures, including those established by the Personal Data Protection Board (“**Board**”), private personal data can be processed by our Company if the following conditions are met:

- (i) It is explicitly required by law; in other words, in cases where the law contains an explicit provision regarding the processing of personal data, **private personal data other than that related to the health and sexual life**, may be processed without having to obtain the explicit consent of the data owner. In any other cases, the explicit consent of the data owner shall be obtained.
- (ii) **In matters related to the protection of public health**, preventive medicine, medical diagnosis, the carrying out of treatment and care services, and the planning and management of health services and health funding, private personal data relating to health and sexual life may be processed without seeking the explicit consent of authorized institutions and organizations, and by persons under obligations to keep such information confidential. In all other situations, the explicit consent of the data owner shall be obtained.

2.4 Categories of Processed Personal Data and Purposes of Processing

The categories of personal data that are processed by our Company in accordance with the Law and the provisions of other relevant legislation, and within the framework of the purposes and conditions stipulated in this Policy, as well as detailed information concerning these categories, can be found in Annex-2 (“**Personal Data Categories**”) to the Policy.

In line with the Law and other legislation, and within the scope of the requirements detailed in the Policy regarding the conditions for the processing of personal data and of private personal data, the purposes of our Company for the processing personal data are as follows:

1. The planning and/or execution of our Company's human resources policies and processes,
2. The planning and/or execution of the activities aimed at ensuring the legal and technical safety of our Company and of the relevant persons in a business relationship with our Company,
3. The planning and/or execution of the activities required for the purpose of customizing the products and services offered by and/or on behalf of our Company according to tastes, usage habits and needs of relevant people, and suggesting and promoting such activities to the relevant people,
4. The carrying out of the necessary works to ensure that the relevant people benefit from the products and/or services offered by and/or on behalf of our Company, and carrying out the relevant business processes for this purpose,
5. The carrying out of the necessary works and other associated business processes by means of our relevant business units so that the necessary business and/or operational activities can be carried out by our Company,
6. The planning and/or execution of our Company's commercial and/or business strategies.

Detailed information on the purposes behind the processing of the personal data in question can be found in Annex-3 ("**Annex 3 - Purposes Of Personal Data Processing**") of this Policy.

3. SECTION 3 – GENERAL POINTS RELATING TO THE TRANSFER OF PERSONAL DATA

In compliance with the law, our Company can, after taking the necessary security measures, transfer the personal data and private personal data of the data owner to third parties for data processing purposes. To this end, our Company shall act in accordance with the provisions of Articles 8 and 9 of the Law. More detailed information on this subject can be found in Annex 4 to the Policy ("**Annex 4 - Third parties to which personal data are transferred by our Company, and the purposes of such transfers**").

3.1 Transfer of Personal Data

Even in the absence of the explicit consent of the data owner, personal data may be transferred to third parties in the event of one or more of the conditions listed below being present, with our Company showing the necessary diligence and implementing all the necessary security measures, including the methods defined by the Board, when performing the transfer:

- When the law clearly defines activities that may require the transfer of personal data,
- When the transfer of personal data by the Company is related to or required for the drawing up or execution of a contract,
- When the transfer of the personal data is a requirement for our Company to fulfill its legal obligations,
- When the personal data transferred by our Company is to the extent that the said data has already been made public, provided that they have been made public by the data owner,
- When the transfer of personal data by the company is an obligation for the Company, the data owner or third parties for the ensuring, exercising or protection of their rights,
- On the condition that the fundamental rights and freedoms of the data owner are not infringed, when the transfer of the personal data is obligatory from the standpoint of our Company's legitimate interests,

- When collecting data from a person incapable of expressing explicit consent, or whose consent is legally void, to protect the life or physical integrity of the person or another person.

If the personal data is to be transferred abroad, it should, in addition to the conditions specified above, be sent by our Company only to foreign countries that have been declared by the Board as having adequate protection (“**Foreign Country with Adequate Data Protection**”) or, if such adequate protection is lacking, to foreign countries for which data controllers in Turkey and in the relevant foreign countries declare/assure in writing that there is adequate protection, and for which the Board has also issued approval (“**Foreign Countries where a Data Controller Guaranteeing Adequate Data Protection is Available**”).

3.2 Transfer of Private Personal Data

In line with the principles of this Policy, and taking any necessary administrative and technical measures, including the methods set by the Board, private personal data can be transferred by our Company should the below conditions be satisfied:

- (i) When explicitly required by law; in other words, when the law contains an explicit provision regarding the transfer of personal data, **private personal data other than that related to the health and sexual life** may be transferred without having to obtain the explicit consent of the data owner. In all other situations, the explicit consent of the data owner shall be obtained.
- (ii) For the purposes of protecting public health, preventive medicine, medical diagnosis, the conducting of treatment and care services, and the planning and management of health services and health funding, **private personal data relating to health and sexual life** can be transferred without seeking the explicit consent of authorized institutions and organizations, and by persons under obligation to keep such information confidential. In all other situations, the explicit consent of the data owner shall be obtained.

If the private personal data is to be transferred abroad, it should be sent only to Foreign Countries with Adequate Data Protection or to Foreign Countries where a Data Controller Guaranteeing Adequate Data Protection is Available, in addition to the conditions specified above.

4. SECTION 4 – INFORMING THE OWNER OF THE PERSONAL DATA

In accordance with Article 10 of the Law and the secondary legislation, our Company will inform the owner of the personal data of the purposes for which their personal data is being processed by the data controller; with which parties and for what purposes the data is being shared; by which methods the data was collected; the legal reasons for its collection; and the rights that the data owners have in relation to the processing of their personal data.

5. SECTION 5 – STORAGE AND DESTRUCTION OF PERSONAL DATA

Our Company stores personal data for as long as is required for the purpose for which it has been processed, and in accordance with the minimum time periods defined in the legislation. Accordingly, our Company first determines whether a specific time period is specified in legislation for the storage of personal data, and acts accordingly if such a time period is defined. If no legally defined time period is available, the personal data is kept for as long as it is necessary, in accordance with the purpose for which it has been processed. Personal data will be destroyed in accordance with pre-

defined methods (deletion and/or disposal and/or anonymization) at the end of its storage period, or at periodic times for designated data destruction, or upon the application/request of the data owner.

6. SECTION 6 – GENERAL POINTS PERTAINING TO THE PROTECTION OF PERSONAL DATA

In line with Article 12 of the Law, our Company takes the necessary measures in accordance with the nature of the data to be protected so as to prevent illegal disclosure, access and transfers of personal data, or any other security vulnerabilities that may arise from other sources. In this regard, our Company takes administrative measures, and conducts audits or has other parties conduct audits, in order to ensure the required level of security defined in the guides published by the Board.

The technical and administrative measures taken by our Company for the protection of personal data are also implemented for the protection of private personal data, with all necessary inspections conducted internally within our Company.

6.1 Increasing and Inspecting the Awareness of Business Units Regarding the Protection and Processing of Personal Data

Our Company carries out the necessary training activities in its business units in order to increase awareness of the safekeeping of data and the prevention of illegal access to and the illegal processing of personal data.

Our Company establishes the necessary systems to raise awareness among both current employees and newly-hired employees regarding the protection of personal data, and works with consultants with experience in this field, if required. To this end, our Company considers participation in potential training events, seminars and informative meetings, and organizes new training activities in parallel with amendments to the relevant legislation.

7. SECTION 7 – RIGHTS OF PERSONAL DATA OWNERS AND THE EXERCISING OF SUCH RIGHTS

7.1 RIGHTS OF PERSONAL DATA OWNERS

Personal data owners retain the right:

- 1) To learn whether your personal data has been processed,
- 2) To request information about how your data has been processed,
- 3) To learn the purpose behind the processing of your personal data, and whether it is being used in accordance with this purpose,
- 4) To learn about the third parties, both in Turkey and abroad, to which your personal data is being transferred,
- 5) To request corrections to your personal data in the event of it being incomplete or having been processed erroneously, and to demand that the third parties receiving your personal data are informed of such corrections,
- 6) Even if your data has been processed in accordance with the Law and the provisions of other laws, to request that your personal data be deleted or destroyed should the initial reasons that required it to be processed no longer be valid, and to demand that any third parties receiving your personal data are informed of such requests,
- 7) To raise an objection in the event of an analysis of your processed data by exclusively automatic systems resulting in an outcome that is disadvantageous to you,

- 8) To ask for compensation in the event of harm suffered due to the processing of your personal data in a manner that is contrary to the law.

7.2 EXERCISING THE RIGHTS OF PERSONAL DATA OWNERS

Data owners can forward their requests concerning their rights listed in Section 7.1 (***“Rights of Personal Data Owners”***) to our Company using the methods defined by the Board. To this end, data owners may use the “Data Owner Application Form” found on the website www.nurolcas.com.tr.

7.3 OUR COMPANY’S RESPONSE TO APPLICATIONS

Our Company takes the necessary administrative and technical measures to bring the data owners’ applications to a conclusion in accordance with the Law and the applicable secondary legislation.

In the event of the owner duly submitting to our Company a request regarding their rights defined in Section 7.1. (***“Rights of Personal Data Owners”***), the Company shall, depending on the nature of the request, respond to it as soon as possible and within 30 (thirty) days at most, free of any charges. However, should this process invoke additional costs, the data owner shall pay a fee determined according to the tariff set by the Board.

ANNEX 1 - PERSONAL DATA OWNERS

PERSONAL DATA OWNER CATEGORY	DESCRIPTION
Prospective Employee / Prospective Intern	: A real person that has made a job application to our Company or who has submitted their CV and other details for review by our Company.
Former Employee	: A real person whose employment contract with our Company has been terminated for any reason (resignation, dismissal, retirement, etc.).
Event Participant	: A real person who has participated in events, organizations and similar activities arranged by our Company.
Scholarship Recipient	: A real person who benefits from the financial aid granted by our Company within the framework of our social responsibility activities.
Submitter of an Opinion/Complaint/Suggestion and Information Request	: A real person who has submitted an opinion/complaint/suggestion or request for information, or some other request, to our Company, regardless of whether they have benefited from the products or services of our Company.
Visitor	: A real person who visits the premises or websites of our Company, or who has joined the Internet-based forum as a guest of our Company.
Campaign/Contest Participant	: A real person who has participated in any campaign or contest held by our Company.
Data Owner's Relatives	: Family members and relatives of our employees and/or of persons benefitting from the products and/or services of our Company.
Supplier's Employee/Official/Shareholder	: A real person who is an employee, official or shareholder of any company that supplies goods and/or services to our Company, pursuant to a contract entered into and/or that might be entered into with our Company.
Business Partner's Employee/Official/Shareholder	: A real person who is an employee, official or shareholder of any company with which our Company has entered into a business partnership for the purpose of selling, promoting and marketing of our Company's goods and services, as well as implementing after-sales support and joint customer loyalty programs.
Other Third Parties	: Real persons and other third parties that fall within the scope of this Policy, but do not fall within the scope of the Nurol Controls and Avionics Systems Inc.'s Policy related to the Protection and Processing of the Personal Data of Employees.

ANNEX 2 - PERSONAL DATA CATEGORIES

CATEGORIES OF PERSONAL DATA	DESCRIPTION
Identity Information :	Data contained on the identity card of the person (Tax number, and documents such as driving license, identity card and passport, etc. that contain information such as the full name, identity number, nationality, names of mother and father, place of birth, birth date, gender, etc. of the data owner)
Contact Information :	Telephone number, address, e-mail, IP address and similar contact information.
Financial Information :	Depending on the type of legal relationship our Company has established with the owner of the personal data, any type of personal data that is processed in documents, information and records that demonstrate any type of financial outcome or status, as well as other data, such as bank account numbers, IBANs, credit card information, financial profile, asset information and revenue information.
Process Safety Information :	Personal data that is processed to ensure the technical, administrative, legal and commercial safety of our Company while conducting our commercial activities (logs, codes, passwords, etc.).
Legal Procedure and Compliance Information :	Personal data that is processed to identify and track our legal receivables and rights, to discharge our debts, to fulfill our legal liabilities and to comply with our Company policies.
Request/Complaint Management Information :	Personal data associated with the receipt and evaluation of any type of request and/or complaint forwarded to our Company.
Visual and Auditory Data :	Data of a visual or auditory nature, such as photographs and camera/sound recordings.
Physical Premises Security Data :	Personal data found in the records and documents taken during entry into and the time spent inside a physical location, such as camera records and visitor logs.
Audit and Inspection Information :	Personal data processed during internal and external auditing activities conducted as part of our Company's legal liabilities, and in compliance with our Company's policies
Prospective Employee/Intern Data :	Personal data of prospective employees and/or interns who have made a job application to our Company, such as CV and interview notes.

Vehicle Information	:	Data such as license plate information of vehicles associated with the owner of the data.
Information on Family Members and Relatives	:	Personal data about family members (spouse, mother, father, children), relatives and emergency contact names of the data owner, which are collected in an effort to protect the legal and other interests of our Company and the data owner within the framework of the operations carried out by our Company's business units.
Private Personal Data	:	Data specified in Article 6 of the Law (health data, biometric data, religion, affiliated associations, etc.).

ANNEX 3 - PURPOSES OF PROCESSING PERSONAL DATA

MAIN PURPOSES (PRIMARY)	SUB-PURPOSES (SECONDARY)
Planning and/or execution of our Company's human resources policies and processes	Planning and/or carrying out of processes related to recruitment and employee personnel issues
	Planning and/or execution of the processes related to the applications, selection and evaluation of prospective employees
	Planning and/or execution of the internal/external activities necessary for the placement of prospective employees and/or students and/or interns
	Planning and/or execution of activities related to the obtaining of references and/or intelligence activities for the recruitment of personnel and/or the Company's security processes
	Planning and/or execution of operational activities necessary for disciplinary/ethical processes
	Planning and/or execution of activities related to the creation, inspection and/or tracking of the personal records of subcontractors' employees
Planning and/or execution of activities aimed at ensuring the legal and technical safety of our Company and of the relevant persons in a business relationship with our Company,	Planning and/or execution of the necessary operational activities to ensure that the Company activities are carried out in line with the Company procedures and/or the relevant legislation
	Planning and/or execution of activities relating to the procedures of Corporate Law and Partnership Law
	Tracking of legal processes
	Planning and/or execution of activities aimed at meeting and registering requests from official institutions and/or organizations for information and/or documents
	Planning and/or execution of activities related to the fight against the laundering of the proceeds of crime and the financing of terrorism, and related to the principle of "know your customer" (KYC)

	<p>and the identification of legal and commercial risks</p> <p>Ensuring the safety of the company's operations</p> <p>Planning, inspection and/or execution of data safety processes</p> <p>Establishment and/or management of information technology infrastructures</p> <p>Planning and/or execution of the company's internal/external inspection, audit, investigation and/or control activities</p> <p>Tracking of contractual processes and/legal requests</p> <p>Ensuring the safety of the Company inventory and/or resources</p> <p>Planning and/or execution of emergency and/or incident management processes</p> <p>Ensuring the safety of Company premises and/or facilities</p> <p>Forming and/or tracking of visitor logs</p>
<p>Carrying out the necessary works to ensure that the relevant people benefit from the products and/or services offered by and/or on behalf of our Company, and carrying out the relevant business processes to this end</p>	<p>Evaluating, tracking and/or managing the clients' requests and/or complaints gathered by digital or other means</p>
<p>Carrying out of the necessary works and other associated business processes by means of our relevant business units so that the necessary business and/or operational activities can be carried out by our Company</p>	<p>Evaluating, tracking and/or managing the clients' requests and/or complaints gathered by digital or other means</p> <p>Planning and/or execution of security measures related to products and services</p> <p>Following-up of financial and/or accounting processes</p> <p>Planning and/or execution of corporate management activities</p> <p>Planning and/or execution of activities aimed at ensuring business continuity</p> <p>Planning and/or execution of purchasing processes</p> <p>Planning and/or execution of social responsibility and/or civil society activities</p> <p>Planning and/or execution of sponsorship activities</p> <p>Planning and/or execution of business activities</p> <p>Planning and/or execution of corporate communication activities</p> <p>Planning and/or execution of operations and/or efficiency processes</p> <p>Defining and/or inspecting the information access authorizations of Employees and other persons outside the Company</p>
<p>Planning and/or execution of our Company's commercial and/or business strategies</p>	<p>Management of relationships with business partners and/or suppliers</p> <p>Planning and/or execution of the company's</p>

	financial risk processes
	Planning and/or execution of the feasibility studies and/or risk assessment activities in the selection of potential business partners/suppliers/subcontractors

ANNEX 4 - THIRD PARTIES TO WHICH PERSONAL DATA IS TRANSFERRED, AND THE PURPOSES OF SUCH TRANSFERS

Recipients of Personal Data	Description	Purpose of Data Transfer
Suppliers	Parties that provide services to our Company within the scope of our Company's business activities, and in line with our Company's instructions and purposes as regards to data processing.	Personal data is transferred to suppliers only to the extent necessary to ensure that the supplier can provide the services outsourced by our Company as required for the execution of our Company's commercial activities.
Group Companies	These are the companies directly or indirectly affiliated with Nurol Holding Anonim Şirketi.. A list of the group companies affiliated with Nurol Holding Anonim Şirketi Inc. can be found at www.nurol.com.tr .	Personal data is transferred only to the extent necessary for the planning and implementation of strategies concerning our Company's business activities, for the conducting of audits and for the evaluation of prospective employees.
Shareholders	Real and legal persons who, in accordance with the provisions of the relevant legislation, are authorized in the design of strategies and audit activities pertaining to the business activities of our Company.	In accordance with the provisions of the relevant legislation, personal data is transferred to shareholders only to the extent necessary for the design of strategies and audit activities pertaining to our Company's business activities.
Legally Authorized Public Institutions and Organizations	Public institutions and organizations such as courts, tax offices, etc., that are authorized to request information and documents from our Company in accordance with the provisions of the relevant legislation.	Personal data is transferred to these institutions and organizations only to the extent that they are requested, within the limits of their legal authority, by the relevant public institutions and organizations.
Legally Authorized Private Institutions	Institutions or organizations that have been established in accordance with	Personal data is transferred to legally authorized private

	the provisions of the relevant legislation and the conditions specified in the Law, and which carry out their activities within the framework defined by the law.	institutions only to the extent that it is relevant to the scope of activities conducted by such legally authorized private institutions.
Business Partners	Parties with which our Company itself, or with Group Companies, has established business partnerships to carry out its various business activities.	Personal data is transferred only to the extent that it is necessary to start and maintain a business partnership.