

## 1 PURPOSE

Pursuant to Article 20 of the Constitution of the Republic of Türkiye, everyone has the right to request respect for their private and family life and the protection of their personal data. This right includes the right to be informed about personal data relating to oneself, to access such data, to request the rectification or erasure thereof, and to learn whether such personal data are used in accordance with their intended purposes.

With the aim of protecting fundamental rights and freedoms of individuals, primarily the right to privacy, in the processing of personal data, and of regulating the obligations and procedures to be complied with by natural and legal persons who process personal data, the Law No. 6698 on the Protection of Personal Data ("KVKK") entered into force upon its publication in the Official Gazette dated 07.04.2016 and numbered 29677.

Plan S Space and Satellite Technologies Inc. ("Company") conducts all processes relating to the processing, storage, and transfer of personal data belonging to its customers, visitors, suppliers, employees, shareholders, potential customers, individuals using its website and network connections, and other natural persons with whom it comes into contact within the scope of its activities, in accordance with the Personal Data Protection and Processing Policy ("Policy").

The purpose of this Policy is to determine the procedures and principles regarding the processing and protection of personal data, to inform data subjects whose personal data are processed, and to ensure compliance with the Law by setting forth the Company's obligations under the KVKK and the relevant legislation in its capacity as data controller.

## 2 DEFINITION

The terms used in the KVKK and in this Policy shall have the meanings set out below:

**EXPLICIT CONSENT:** Refers to consent that is given freely, based on adequate information, and in relation to a specific matter.

**Anonymization:** Refers to the process of rendering personal data incapable of being associated with an identified or identifiable natural person, even when matched with other data.

**Employee:** Refers to the Company's employees, interns, and apprentices, as well as members of the Company's board of directors and its authorized representatives.

**Job Applicant:** Refers to natural people who apply for employment with the Company or who are considered as candidates by the Company.

**Shareholder:** Refers to the Company's natural or legal person shareholders.

**Data Subject:** Refers to the natural person whose personal data is processed.

**Personal Data:** Refers to any information relating to an identified or identifiable natural person.

**KVKK:** Refers to Law No. 6698 on the Protection of Personal Data, which entered into force upon its publication in the Official Gazette dated 07.04.2016 and numbered 29677.

**Board:** Refers to the Personal Data Protection Board.

**Authority:** Refers to the Personal Data Protection Authority.

**Potential Customer:** Refers to natural or legal people who may potentially benefit from the products or services offered by the Company.

**Subcontractor:** Refers to natural or legal people who, as employers, undertake a part of a specific work or its ancillary activities from the Company and employ their own workers on their behalf.

**Supplier:** Refers to natural or legal people who provide products or services to the Company.

**Third Party:** Refers to natural people who are not directly related to the Company's activities, but who indirectly benefit from such activities, such as relatives of employees, visitors, and similar persons.

**Data Processing:** Refers to any operation performed on personal data, whether by fully or partially automated means or by non-automated means provided that the data form part of a data filing system, such as the collection, recording, storage, preservation, alteration, disclosure, transfer, acquisition, classification, or prevention of the use of personal data.

**Data Filing System:** Refers to the recording system in which personal data are structured and processed according to specific criteria.

**Data Controller:** Refers to the natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data filing system.

**Visitor:** Refers to natural persons and representatives of legal entities who physically visit the Company for business or visiting purposes, or who use the Company's website and network infrastructure.

### 3 GENERAL PRINCIPLES GOVERNING THE PROCESSING OF PERSONAL DATA

The Company processes personal data in compliance with the Constitution of the Republic of Türkiye, the KVKK, and the secondary legislation issued or to be issued by the Authority.

#### 3.1 LAWFULNESS AND FAIRNESS

The Company processes personal data in compliance with the fundamental rights and freedoms guaranteed under the Constitution of the Republic of Türkiye, and in accordance with the applicable legislation and the principles of good faith.

#### 3.2 ACCURACY AND, WHERE NECESSARY, BEING KEPT UP TO DATE

The Company takes the necessary administrative and technical measures to ensure that the personal data processed are accurate and up to date and carries out the necessary actions to rectify and update personal data in cases where they are processed incompletely or inaccurately.

#### 3.3 PROCESSING FOR SPECIFIC, EXPLICIT AND LEGITIMATE PURPOSES

The Company processes personal data for specific, explicit, and legitimate purposes, in accordance with the KVKK, in order to fulfill its obligations and commitments arising within the scope of its activities.

#### 3.4 BEING RELEVANT, LIMITED, AND PROPORTIONATE TO THE PURPOSES FOR WHICH THEY ARE PROCESSED

The Company processes personal data only to the extent necessary to achieve the specified purposes, and refrains from processing personal data that is unrelated to such purposes or fall outside the scope of its activities.

- [CLASSIFICATION] -

### **3.5 RETENTION FOR THE PERIOD PRESCRIBED BY RELEVANT LEGISLATION OR REQUIRED FOR THE PURPOSE OF PROCESSING**

Personal data processed by the Company is retained for the period prescribed by the relevant legislation or for as long as necessary for the purposes for which they are processed.

In this context, the Company first determines whether a specific retention period is prescribed under the applicable legislation; where such a period is prescribed, the Company acts in accordance with that period. Where no retention period is prescribed, personal data are retained for the period necessary for the purposes of processing.

Upon expiry of the retention period, personal data shall be erased, destroyed, and/or anonymized in accordance with the applicable legislation, either through periodic disposal processes or upon the request of the data subject.

## **4 GENERAL CONDITIONS FOR THE PROCESSING OF PERSONAL DATA**

Pursuant to paragraph three of Article 20 of the Constitution of the Republic of Türkiye, personal data may be processed only in cases prescribed by law or where the explicit consent of the data subject has been obtained.

In this context, the Company processes personal data within the scope of its activities and business processes, in accordance with the data processing conditions set out in Article 5 of the KVKK.

Pursuant to Article 5 of the KVKK, personal data may not, as a rule, be processed without the explicit consent of the data subject. Explicit consent refers to consent that is given in relation to a specific matter, based on adequate information, and expressed freely.

However, where one of the following conditions set out in paragraph two of Article 5 of the KVKK exists, personal data may be processed without seeking the explicit consent of the data subject.

### **4.1 EXPLICITLY PRESCRIBED BY LAW**

Where the processing of personal data is explicitly prescribed under the KVKK or other laws, personal data may be processed without seeking the explicit consent of the data subject.

### **4.2 IMPOSSIBILITY OF OBTAINING CONSENT**

Where the data subject is unable to express consent due to actual impossibility or where consent is not legally valid, and the processing of personal data is mandatory for the protection of the life or physical integrity of the data subject or another person, personal data may be processed without explicit consent.

### **4.3 ESTABLISHMENT OR PERFORMANCE OF A CONTRACT**

Provided that it is directly related to the establishment or performance of a contract, where the processing of personal data belonging to the parties to the contract is necessary, personal data may be processed without explicit consent.

- [CLASSIFICATION] -

#### **4.4 FULFILLMENT OF A LEGAL OBLIGATION**

Where the processing of personal data is mandatory for the Company, in its capacity as data controller, to fulfill its legal obligations, personal data may be processed without explicit consent.

#### **4.5 DATA MADE PUBLIC BY THE DATA SUBJECT**

Personal data that has been made public by the data subject may be processed without explicit consent, provided that such processing is limited to the purposes of processing and carried out within the scope of the Company's activities.

#### **4.6 ESTABLISHMENT, EXERCISE OR PROTECTION OF RIGHT**

Where the processing of personal data is necessary for the establishment, exercise, or protection of a right, personal data may be processed without explicit consent.

#### **4.7 LEGITIMATE INTEREST**

Provided that the fundamental rights and freedoms of the data subject are not harmed, where the processing of personal data is necessary for the legitimate interests of the Company, personal data may be processed without explicit consent.

Personal data are processed by the Company within the scope of one or more of the conditions set out in paragraph two of Article 5 of the KVKK and strictly limited to such conditions.

Where none of these conditions exist, personal data shall be processed only upon obtaining the explicit consent of the data subject in due form.

### **5 PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA**

Pursuant to Article 6 of the KVKK, data relating to a person's race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data, are deemed to be special categories of personal data.

Such special categories of personal data may be processed only where one of the conditions set out in Article 6 of the KVKK exists. Accordingly, special categories of personal data may be processed in the following cases:

- where the explicit consent of the data subject is obtained;
- where explicitly prescribed by law;
- where the data subject is unable to express consent due to actual impossibility or where consent is not legally valid, and processing is mandatory for the protection of the life or physical integrity of the data subject or another person;
- where the personal data have been made public by the data subject, provided that they are processed in accordance with the data subject's intention to make them public;
- where processing is mandatory for the establishment, exercise, or protection of a right;

- [CLASSIFICATION] -

- where processing is necessary, by persons or authorized institutions and organizations subject to a confidentiality obligation, for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning, management, and financing of healthcare services.
- where processing is mandatory for the fulfillment of legal obligations in the fields of employment, occupational health and safety, social security, social services, and social assistance.
- where processing is carried out by associations, foundations, and similar organizations with political, philosophical, religious, or trade union purposes, within the scope of their lawful activities and limited solely to their members.

In the processing of special categories of personal data, the Company implements adequate technical and administrative measures as determined by the Board.

## 6 METHODS AND LEGAL GROUNDS FOR THE COLLECTION AND PROCESSING OF PERSONAL DATA

Your personal data are collected and processed in electronic and/or physical environments through written and/or online forms, telephone, fax, e-mail, courier services, the website, information systems, and similar communication channels, when you contact the Company or when contact is established within the scope of the Company's activities.

The personal data collected are processed based on the data processing conditions set out in Articles 5 and 6 of the KVKK, or, where such conditions are not present, based on the explicit consent of the data subject.

Traffic data and location data obtained by the Company within the scope of electronic communications infrastructure and similar services are processed in accordance with the Electronic Communications Law No. 5809 and the relevant secondary legislation.

The processes relating to the collection, storage, and transfer of such data are carried out in compliance with the procedures and principles prescribed under the applicable legislation. The storage of traffic and location data in Türkiye and their transfer abroad are conducted in consideration of the provisions of the applicable legislation.

Personal data may be shared with duly authorized public institutions and organizations upon their lawful requests, limited to the relevant legal basis and the scope of such request.

Where traffic and location data constitute personal data, their processing shall be carried out in compliance with the principles, obligations, and data security measures set out in the Law No. 6698 and the relevant legislation.

- [CLASSIFICATION] -

## 7 CATEGORIES OF PERSONAL DATA

The Company may process personal data belonging to shareholders/partners, employees, suppliers, subcontractors, business partners, potential customers, visitors, and other third parties, within the categories set out below.

### 7.1 IDENTITY DATA

Data that enables the identification of natural persons. These may include:

- Name and surname,
- Turkish Identification Number,
- Nationality,
- Mother's name, father's name,
- Marital status,
- Place and date of birth,
- Gender,
- Copies of identity cards and/or driver's licenses, including serial and sequence numbers,
- Signature and/or initials.

### 7.2 CONTACT DATA

Data enabling communication with the data subject. These may include:

- Telephone number,
- Full address,
- E-mail address,
- Registered Electronic Mail (KEP) address.

### 7.3 FINANCIAL DATA

Data relating to financial transactions. These may include:

- Tax identification number,
- Bank account details,
- Payment and collection information,
- Income information,
- Outstanding receivables and payables balances,
- Financial performance information.

### 7.4 EMPLOYMENT / PERSONNEL DATA

Data relating to the employment rights and records of employees and individuals having an employment relationship with the Company. These may include:

- Payroll information,
- Professional qualifications and certificates,
- Occupational health and safety training records, and any other personal data forming the basis for the establishment of employment rights.

### 7.5 SPECIAL CATEGORIES OF PERSONAL DATA

Special categories of personal data within the scope of Article 6 of the KVKK. Within this scope, health data may be processed.

- [CLASSIFICATION] -

## 7.6 LEGAL TRANSACTION DATA

Data processed for the purposes of fulfilling the Company's legal obligations and protecting its rights. These may include:

- Information relating to legal receivables and liabilities,
- Information relating to enforcement and litigation files,
- Data is contained in court and administrative authority decisions.

## 7.7 PHYSICAL PREMISES SECURITY DATA

Data processed to ensure security within the Company's premises. These may include:

- Records of entry to and exit from physical premises,
- Camera (CCTV) recordings.

## 7.8 VISUAL AND AUDIO DATA

Visual and/or audio recordings belong to natural people. These may include:

- Photographs,
- Image and sound recordings (excluding those processed within the scope of physical premises security).

## 7.9 POTENTIAL CUSTOMER TRANSACTION DATA

Data relating to transactions and requests of potential customers. These may include:

- Order and request information,
- Invoice amounts,
- Cheque and promissory note information.

## 7.10 RISK MANAGEMENT DATA

Data processed in accordance with the law and the principle of good faith in order to manage the Company's commercial, technical, and administrative risks.

## 7.11 INFORMATION SECURITY DATA

Data processed to ensure the security of the Company's information systems. These may include:

- IP address information,
- Website login and access records,
- Log records.

## 8 DATA SUBJECT GROUPS

The data subjects whose personal data are processed by the Company are classified under the following groups within the scope of the KVKK and this Policy:

**Potential Customer:** Refers to natural or legal people who may potentially benefit from the products and services offered by the Company.

**Employee:** Refers to the Company's employees, interns, apprentices, as well as members of the board of directors and the Company's representatives.

**Job Applicant:** Refers to natural people who apply for employment with the Company, submit their CVs, participate in interviews, or are otherwise considered as candidates by the Company.

- [CLASSIFICATION] -

**Visitor:** Refers to natural persons and representatives of legal entities who physically visit the Company for business or visiting purposes, or who use the Company's website and/or network infrastructure.

**Shareholder:** Refers to the Company's natural or legal person shareholders.

**Subcontractor:** Refers to natural or legal people who undertake a part of a specific work or its ancillary activities from the Company, employ their own workers, and act in the capacity of an employer.

**Supplier:** Refers to natural or legal people who provide products or services to the Company.

**Third Party:** Refers to natural people who are not directly related to the Company's activities, but who indirectly benefit from such activities, such as relatives of employees, visitors, and similar people.

## 9 PURPOSES OF PROCESSING PERSONAL DATA

The Company processes personal data in accordance with the Law No. 6698 on the Protection of Personal Data, the relevant legislation, and this Policy, for specific, explicit, and legitimate purposes, provided that such processing is related to its activities and is limited and proportionate. Within this framework, personal data may be processed for the purposes listed below, including but not limited to:

### 9.1 PLANNING AND EXECUTION OF HUMAN RESOURCES PROCESSES

- Conducting recruitment, placement, appointment, promotion, and termination processes for employees,
- Managing application processes for job applicants, interns, and apprentices,
- Managing employees' personnel, payroll, remuneration, leave, and fringe benefit processes,
- Planning and implementing performance evaluation, career development, and talent management activities,
- Conducting occupational health and safety activities,
- Planning and delivering training activities,
- Managing work permit and residence permit processes for foreign employees,
- Conducting processes aimed at ensuring employee satisfaction and engagement,
- Conducting disciplinary and ethics processes,
- Identifying and implementing incentives available under the relevant legislation.

### 9.2 ENSURING LEGAL, TECHNICAL, AND PHYSICAL SECURITY

- Ensuring that the Company's activities are conducted in compliance with legislation and internal company policies,
- Conducting internal and external audits, inspections, reviews, and investigations,
- Ensuring the security of physical premises and facilities,
- Establishing, managing, and securing the information technology infrastructure,
- Managing information security and access authorizations,
- Conducting emergency and incident management processes,
- Ensuring the security of the Company's assets and resources,
- Providing information to authorized people, institutions, and organizations in accordance with the legislation.

## 9.3 PROVISION OF PRODUCTS AND SERVICES AND MANAGEMENT OF CUSTOMER RELATIONS

- Managing relationships with customers and potential customers,
- Evaluating and resolving requests, complaints, and feedback,
- Conducting sales, marketing, and customer satisfaction activities,
- Planning and carrying out advertising, promotional, and marketing activities (where necessary, upon obtaining explicit consent),
- Organizing corporate communication activities, events, fairs, campaigns, and invitations,
- Conducting market research, analysis, and reporting activities.

## 9.4 CONDUCT OF COMMERCIAL AND OPERATIONAL ACTIVITIES

- Managing procurement, sales, and after-sales support processes for goods and services,
- Managing production, assembly, installation, and operational processes,
- Conducting logistics, shipment, and inventory management activities,
- Conducting finance, accounting, and reporting activities,
- Conducting corporate governance and internal reporting activities,
- Performing efficiency, adequacy, and process analyses.

## 9.5 BUSINESS DEVELOPMENT, STRATEGIC PLANNING, AND MANAGEMENT ACTIVITIES

- Conducting business development and strategic planning activities,
- Managing investment processes and financial risk management,
- Conducting retention and archiving activities,
- Managing relationships with business partners, suppliers, and subcontractors,
- Conducting corporate and partnership law processes,
- Conducting activities to ensure business continuity,
- Performing studies aimed at improving business processes.

## 10 MATTERS RELATING TO THE TRANSFER OF PERSONAL DATA

The Company may transfer personal data to third parties for lawful purposes, in compliance with the KVKK, the relevant legislation, and this Policy, and by taking the necessary administrative and technical data security measures.

In the processes relating to the transfer of personal data, the Company acts in accordance with Articles 8 and 9 of the KVKK.

### 10.1 TRANSFER OF PERSONAL DATA WITHIN TÜRKİYE

Personal data may be transferred to third parties located within Türkiye without obtaining the explicit consent of the data subject, pursuant to Article 8 of the KVKK, provided that one or more of the data processing conditions set out in Articles 5 and 6 of the KVKK exist.

Within this scope, personal data may be transferred without explicit consent in the following cases:

- where explicitly prescribed by law,

- [CLASSIFICATION] -

- where it is directly related and necessary for the establishment or performance of a contract,
- where it is mandatory for the Company to fulfill its legal obligations,
- where the data have been made public by the data subject, limited to the purpose of such disclosure,
- where it is mandatory for the establishment, exercise, or protection of a right,
- where it is mandatory for the legitimate interests of the Company, provided that the fundamental rights and freedoms of the data subject are not harmed,
- where processing is mandatory for the protection of life or physical integrity in cases where consent cannot be expressed due to actual impossibility.

## 10.2 TRANSFER OF PERSONAL DATA ABROAD

The transfer of personal data abroad may be carried out pursuant to Article 9 of the KVKK in the following cases:

- where there is an adequacy decision issued by the Personal Data Protection Board regarding the country, sector, or international organization to which the personal data will be transferred; or
- where there is no adequacy decision:
  - where one of the appropriate safeguards determined by the Board (such as standard contractual clauses, binding corporate rules, etc.) is provided, and
  - where the data subjects are informed about the transfer;
  - or
- where one of the exceptional circumstances set out in the KVKK exists.

## 10.3 TRANSFER OF SPECIAL CATEGORIES OF PERSONAL DATA

In the processes relating to the transfer of all personal data, including special categories of personal data, additional technical and administrative security measures appropriate to the nature of the data are implemented, and the adequate measures determined by the Personal Data Protection Board are complied with.

## 11 RETENTION OF PERSONAL DATA

Personal data processed by the Company is retained for the periods prescribed under the relevant laws and legislation. In this context, the Company first determines whether a specific retention period is stipulated under the applicable legislation and, where such a period is prescribed, acts in accordance with that period.

Where no retention period is stipulated under the relevant legislation, personal data is retained for as long as necessary for the purposes for which they are processed. Upon the expiry of the determined retention periods, personal data are destroyed through periodic disposal processes or upon the request of the data subject, by using the prescribed disposal methods (erasure, destruction, and/or anonymization).

Notwithstanding the above, even if the purpose of processing personal data has ceased and the retention periods prescribed under the relevant laws and legislation have expired, such personal data may still be retained, limited solely to the purposes of constituting evidence in potential legal disputes or enabling

- [CLASSIFICATION] -

the establishment of a defense in relation to any rights and claims that may be asserted in connection with such personal data.

In determining such retention periods, the statute of limitations set out under the applicable legislation and past claims and disputes previously brought against the Company are also taken into consideration. Personal data retained within this scope is accessed solely for the purpose of resolving legal disputes and are not accessed for any other purpose.

## **12 PROCEDURES FOR THE ERASURE, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA**

Personal data processed by the Company in compliance with the Constitution of the Republic of Türkiye, the KVKK, the relevant legislation, and the regulations of the Board shall, pursuant to Article 7 of the KVKK, be erased, destroyed, or anonymized -either upon the request of the data subject or ex officio -where the reasons requiring their processing cease to exist and the applicable retention periods expire, by using the designated periodic disposal methods.

In the processes of erasure and destruction of personal data:

- Personal data stored in physical form are physically destroyed,
- Personal data stored in electronic form are erased using secure software-based methods,
- Where necessary, personal data are destroyed by experts in a manner that renders them irrecoverable.

In addition, the Company may anonymize personal data by applying techniques appropriate to the nature of the data — such as masking, aggregation, data derivation, hashing, and similar methods — so that the data cannot, under any circumstances, be associated with an identified or identifiable natural person, even when matched with other data.

In the processes relating to the erasure, destruction, and anonymization of personal data, the Company takes into account the provisions of other applicable laws as well as the regulations, principal decisions, and guidelines issued by the Board.

## **13 RECIPIENT GROUPS TO WHOM PERSONAL DATA MAY BE TRANSFERRED AND PURPOSES OF TRANSFER**

Personal data processed by the Company may be transferred to the recipient groups listed below, in accordance with Articles 8 and 9 of the KVKK and the principles set out in this Policy, provided that such transfer is limited to the purposes of processing. Necessary administrative and technical security measures are implemented during the transfer of personal data.

Recipient Group	Description	Purpose of Data Transfer
<b>Suppliers / Subcontractors</b>	Natural or legal people who provide products or services to the Company in line with the Company's data processing purposes and instructions within	Establishment and security of information systems; conduct of occupational health and safety activities; support for human resources processes; provision

- [CLASSIFICATION] -

	the scope of its commercial activities	of employee benefits and entitlements; management of insurance processes; procurement of outsourced services
<b>Financial Institutions</b>	Banks within the Banks Association of Türkiye and other authorized financial institutions	Execution of payment and collection transactions; payment of salaries and fringe benefits; fulfillment of financial and accounting obligations
<b>Shareholders</b>	The Company's natural or legal person shareholders.	Conduct of strategic planning, audit, and corporate governance activities relating to the Company's commercial operations; fulfillment of information and disclosure obligations arising from the relevant legislation
<b>Legally Authorized Public Institutions and Organizations</b>	Public institutions and organizations authorized under the applicable legislation to request information and documents from the Company (courts, tax offices, Social Security Institution, notaries, law enforcement authorities, etc.)	Fulfillment of legal obligations and provision of information and documents requested by such authorities within the scope of their legal powers
<b>Legally Authorized Private Institutions and Private Law Legal Entities / Natural Persons</b>	Private institutions and private law natural or legal people operating in accordance with the relevant legislation and having specific legal duties and authorities	Conduct of audit activities (e.g., independent audit firms); conduct of legal activities (e.g., contracted law firms); management of business relationships and subcontracting relations with firms engaged for cooperation and performance of business activities

## 14 INFORMATION OF DATA SUBJECTS

For the purpose of informing data subjects whose personal data are processed by the Company, an "Information Notice on the Law No. 6698 on the Protection of Personal Data" is prepared in accordance with the KVKK, and the required information is provided to data subjects within the procedures and timeframes prescribed under the KVKK.

The Information Notice includes information on the identity of the data controller, the purposes for which personal data are processed, to whom and for what purposes personal data may be transferred,

- [CLASSIFICATION] -

the method and legal grounds for the collection of personal data, and the rights of the data subject under Article 11 of the KVKK.

Through this Policy, the procedures and principles regarding the processing and protection of personal data by the Company are also established, and data subjects are further informed within the scope of the KVKK.

The Company may fulfill its obligation to inform data subjects under the KVKK by various methods without any time limitation, and the Information Notice and relevant policy documents are published on publicly accessible platforms, primarily at [www.plan.space](http://www.plan.space).

## 15 MEASURES TAKEN FOR THE PROTECTION OF PERSONAL DATA

Pursuant to Article 12 of the KVKK, the Company takes the necessary administrative and technical measures to ensure an adequate level of security in order to prevent the unlawful processing of personal data and unlawful access to such data, and to safeguard the retention of personal data, and conducts or commissions the necessary audits within this scope.

In the event that personal data is obtained by third parties through unlawful means despite all measures taken, the Company shall notify the data subject and the Personal Data Protection Board as soon as possible.

### 15.1 ADMINISTRATIVE MEASURES

- Providing regular training to personnel on the protection of personal data,
- Limiting access authorizations in accordance with job descriptions,
- Obtaining confidentiality and data security undertakings,
- Including data security provisions in contracts concluded with employees, suppliers, and service providers,
- Periodically auditing personal data processing activities,
- Establishing data breach management procedures.

### 15.2 TECHNICAL MEASURES

- Implementing authorization and access control mechanisms,
- Using logging, monitoring, and audit trail systems,
- Taking network and application security measures,
- Applying encryption, masking, and backup techniques,
- Regularly updating cybersecurity measures,
- Implementing additional security measures for special categories of personal data.

### 15.3 AUDIT OF MEASURES

The Company has established the necessary organizational structure to fulfill its obligations as a data controller under the KVKK and the relevant legislation, and the coordination and supervision of personal data protection processes are carried out by the relevant units. Audit results are reported to senior management, and corrective measures are taken where necessary.

- [CLASSIFICATION] -

## 16 RIGHTS OF THE DATA SUBJECT AND APPLICATION MANAGEMENT

### 16.1 RIGHTS OF THE DATA SUBJECT

Pursuant to Article 11 of the KVKK, the data subject has the right to:

- learn whether their personal data are processed,
- request information if their personal data has been processed,
- learn the purpose of processing and whether personal data are used in accordance with such purpose,
- know the third parties to whom personal data are transferred, domestically or abroad,
- request the rectification of personal data if they are processed incompletely or inaccurately,
- request the erasure or destruction of personal data within the scope of Article 7 of the KVKK,
- request notification of the operations carried out to third parties to whom personal data have been transferred,
- object to the occurrence of a result against them through the analysis of their personal data exclusively by automated systems,
- claim compensation for damages in the event that they suffer damage due to unlawful processing of their personal data.

### 16.2 APPLICATION MANAGEMENT

Data subjects may submit their requests regarding their rights to the Company in accordance with Article 13 of the KVKK by using the methods set out below:

Application Method	Application Address	Explanation
Written Application	Üniversiteler, Bilkent 1596. St. No: 8/1, 06800 Çankaya / Ankara	The envelope should state "Request for Information within the Scope of KVKK"
Registered Electronic Mail (KEP)	plans@hs03.kep.tr	Subject: "KVKK Information Request"
Registered E-mail	info@plan.space	Subject: "KVKK Information Request"

Applications shall be concluded free of charge within **30 days at the latest**. However, the Company reserves the right to charge a fee in accordance with the tariff determined by the Board.

If the application is rejected or not responded to within the statutory period, the data subject may file a complaint with the Personal Data Protection Board.

## 17 EXCEPTIONS

Pursuant to Article 28 of the KVKK, data subjects may not exercise their rights under the KVKK in the following cases:

- where personal data are processed by anonymization for the purposes of research, planning, and statistics,
- where personal data are processed within the scope of ensuring national defense, national security, public security, and public order,

- [CLASSIFICATION] -

- where personal data are processed by authorized authorities in relation to investigation, prosecution, judicial proceedings, or execution of sentences.

In addition, pursuant to the KVKK, except for the right to claim compensation for damages, other rights cannot be exercised in the following cases:

- where processing is necessary for the prevention or investigation of crimes,
- where the processing concerns personal data that have been made public by the data subject,
- where processing is carried out by authorized public institutions and organizations for the purposes of performing supervisory or regulatory duties,
- where processing is necessary for the protection of the economic and financial interests of the State.

It is important that the information shared by the data subject is accurate and up to date in order to effectively exercise their rights under the KVKK. Any liability arising from the provision of inaccurate or incomplete information shall rest with the subject of the data.

## **18 ENTRY INTO FORCE, UPDATES AND PUBLICATION OF THE POLICY**

This Personal Data Protection and Processing Policy shall enter into force on the date of its publication. The Company reserves the right to amend this Policy at any time in line with the applicable legislation and the decisions of the Personal Data Protection Board. Any updates shall become effective as of the date of publication of the updated version and shall be announced to the public through appropriate means. This Policy is published on the Company's website to ensure accessibility for data subjects and may also be provided to data subjects upon request.

- [CLASSIFICATION] -