	PROCEDURE REGARDING THE PROTECTION AND CONFIDENTIALITY OF PRIVATE PERSONAL DATA	Document Number	PRS00066
		First Publication Date	06/12/2021
		Revision Number	00
		Revision Date	
		Page Number	1/9

1. PURPOSE

Employees, interns, employee and trainee candidates, company officials/representatives, real person shareholders, real person customers of Metro Istanbul Sanayi ve Ticaret Anonim Sirketi (*"Our Company" or "METRO İSTANBUL A.S."*) and website visitors, natural person external service providers/business partners and external service providers/business partners' employees, contacts, managers, potential/current/former customers and other third parties attach great importance to the protection of private personal data.

For this reason, the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, dress and appearance, membership of associations, foundations or trade unions of persons who have private personal data obtained within the scope of our Company's activities and in accordance with the Law on Protection of Personal Data No. 6698. Data on health, sexual life, criminal convictions and security measures, as well as biometric and genetic data will be handled appropriately, complying with the regulations in the relevant legislation, especially the procedures and principles referred to in the KVKK and the Decision of the Personal Data Protection Board dated 31.01.2018 and numbered 2018/10.

This Procedure has been prepared for the processing of private quality personal data obtained during the activities of our Company within the framework of the principles mentioned in the KVKK.

2. CONTEXT


In accordance with KVKK and related legislation, METRO İSTANBUL A.S. All private personal data processing processes carried out by the Company are within the scope of this Procedure.

3. SOURCE DOCUMENTS

4. DEFINITIONS

Definitions are stated below within the scope of this procedure:

- **METRO İSTANBUL A.S. or Our Company:** Metro Istanbul Sanayi ve Ticaret Anonim Sirketi.
- **Explicit Consent:** Consent on a particular subject, based on information and free will, with a clear and unambiguous, limited only to that transaction.
- **Anonymization:** Making personal data incapable of being associated with an identified or identifiable natural person in any way, even by matching with other data.
- **Employee:** METRO İSTANBUL A.S. employees,
- **Relevant Person (Personal Data Owner):** Natural persons whose personal data are processed.
- **Personal Data:** Any information relating to an identified or identifiable natural person.
- **Private Personal Data:** Data on people's race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance, membership in associations, foundations or unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data.
- **Processing of Personal Data:** Obtaining, recording, storing, saving, changing, rearranging, disclosing, transferring, taking over, making available personal data by fully or partially automatic or non-automatic means provided that it is a part of any data recording system, all kinds of operations carried out on the data, such as the classification or prevention of its use.


	ÖZEL NİTELİKLİ KİŞİSEL VERİLERİN KORUNMASI VE GİZLİLİĞİNE İLİŞKİN PROSEDÜR	Doküman No	PRS00066
		İlk Yayın Tarihi	06/12/2021
		Revizyon No	00
		Revizyon Tarihi	
		Sayfa No	2/9

- **Data Processor:** The natural or legal person who processes personal data on behalf of the Data Controller based on the authority given by the Data Controller.
- **Data Controller:** 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 recording system.
- **KVKK Board:** Personal Data Protection Board.
- **KVKK Authority:** Personal Data Protection Authority.
- **KVKK:** Law No. 6698 on the Protection of Personal Data, published in the Official Gazette dated 7 April 2016 and numbered 29677.
- **Procedure:** METRO İSTANBUL A.S. Personal Data Protection and Processing Procedure.

5. ROLE and RESPONSIBILITIES

The "Personal Data Protection Commission" has been established within the body of METRO İSTANBUL A.S. to be responsible for the fulfilment of the actions determined for compliance in order to manage this policy and other policies connected and related to this policy. The Commission includes Information Technologies and Data Security Officer, Personal Data Policy Officer, Storage and Disposal Policy Officer. The task of this commission is as follows:

- To determine the basic policies regarding the processing and protection of personal data and what needs to be done to comply with the legislation,
- Submitting the determined basic policy and action steps to the approval of the senior management and to monitor and coordinate its implementation,
- To decide how the policies regarding the processing and protection of personal data will be implemented and how the audit will be carried out, to make necessary assignments after obtaining the approval of the senior management,
- Ensuring the compliance of personal data processing activities that will come to the agenda within the scope of activities carried out in the units specific to the KVK legislation, and auditing when necessary,
- To determine the risks that may occur in the personal data processing activities of the company and to ensure that the necessary measures are taken; submitting improvement suggestions to the top management for approval, supervising the administrative and technical measures taken,
- Ensuring that explicit consent is obtained, clarifications are made and existing clarification texts are up-to-date when needed,
- To ensure that employees are trained on the protection of personal data and Company policies,
- To decide on the applications of personal data owners at the highest level,
- To make necessary arrangements within the company for the company to fulfil its obligations under KVKK,
- To follow the developments on the protection of personal data and to advise the senior management on what to do within the scope of these developments,
- Managing relations with the Institution and the Board,
- The Information Systems Department is responsible for the preparation and updating of the procedure,

	ÖZEL NİTELİKLİ KİŞİSEL VERİLERİN KORUNMASI VE GİZLİLİĞİNE İLİŞKİN PROSEDÜR	Doküman No	PRS00066
		İlk Yayın Tarihi	06/12/2021
		Revizyon No	00
		Revizyon Tarihi	
		Sayfa No	3/9

- The Process Management Supervisor is responsible for the approval, publication and supervision of all procedures,
- All units are responsible for the implementation of the activities/operations covered by the procedure.

6. EXECUTION

6.1 LEGAL OBLIGATIONS

The legal obligations of our Company, as a data controller, within the scope of protection and processing of private personal data are listed below:

6.1.1 Obligation to Clarify

As the data controller, our Company has an obligation to inform the data subject about the following issues while obtaining private personal data:

- For what purpose the private personal data of the persons concerned will be processed,
- Our company's information and the information on the identity of the representative(s), if there is any,
- To whom and for what purpose the processed private personal data can be transferred,
- Method of obtaining private data and legal reason and
- Rights arising from the law

Care will be taken to ensure that the aforementioned clarification texts are understandable and easily accessible to the persons concerned.

In accordance with the aforementioned disclosure obligation, the clarification texts prepared to inform the relevant persons will be updated in case a new special data processing process comes to the fore.

6.1.2 Obligation to ensure data security

As the data controller, our Company is obliged to take the administrative and technical measures stipulated in the legislation in order to ensure the security of the personal data of special nature. Obligations and measures regarding data security are detailed in section 10 of this Procedure.


6.2 PROCESSING OF PRIVATE PERSONAL DATA

6.2.1 Processing Principles

Private personal data will be processed in accordance with the following principles:

6.2.1.1 Processing in Compliance with Law and Integrity

Private personal data will be processed in accordance with the rules of honesty, with transparent methods and within the framework of the disclosure obligation.

	ÖZEL NİTELİKLİ KİŞİSEL VERİLERİN KORUNMASI VE GİZLİLİĞİNE İLİŞKİN PROSEDÜR	Doküman No	PRS00066
		İlk Yayın Tarihi	06/12/2021
		Revizyon No	00
		Revizyon Tarihi	
		Sayfa No	4/9

6.2.1.2 Ensuring the accuracy and, up-to-dateness of private personal data

In order to ensure that the processed data is correct and up-to-date, the data subject will be provided with the opportunity to update the personal data and, if any, to correct the errors in the processed data.

6.2.1.3 Processing for specific, explicit and legitimate purposes

Our company's private personal data will be processed within the scope of activities whose scope and content are clearly defined, in accordance with the legislation and within the scope of the legitimate purposes determined to maintain it within the framework required by the ordinary pace of life.

6.2.1.4 Being connected, limited and measured with the purpose for which private personal data is processed

Private personal data will be processed in connection with the determined purposes, in a limited and measured manner.

The processing of private personal data that is not related to the realisation of the intended purpose or that does not need to be processed for the realisation of the purpose will be avoided. In case the need to use the obtained private personal data for other purposes arises, a new data processing process will come to the fore again; the said process will be carried out within the scope of the processing conditions stipulated in the KVKK, as if the data processing is started for the first time.

6.2.1.5 Storage of private personal data for the periods stipulated in legal regulations or required by legitimate interests

Many regulations in the legislation require that personal data of special nature be kept for a certain period of time. Therefore, the private personal data processed by our Company will be stored for the periods stipulated in the relevant legislation or required for the purposes of processing the private personal data.

In case the storage period stipulated in the legislation expires or the purpose of processing disappears, the personal data of special nature, it will be deleted, destroyed or anonymized in accordance with the METRO İSTANBUL A.S. Data Retention and Destruction Policy.

6.2.1.6 Explicit Consent


Private personal data (excluding data related to health and sexual life) will be processed by taking the administrative and technical measures stipulated by the KVKK Board, in the presence of the explicit consent of the data subject or in cases required by the legislation.

Private personal data related to health and sexual life, protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, can be processed without seeking the explicit consent of persons or authorised institutions and organisations who are under the obligation of confidentiality.

6.3 TRANSFER OF PRIVATE PERSONAL DATA

6.3.1 Domestic transfer of private personal data

Private personal data will be transferred without seeking the explicit consent of the data subject in case of the existence of the reasons for compliance with the law defined in the KVKK, and in the absence of such circumstances, by obtaining the explicit consent of the data subject regarding the transfer.

	ÖZEL NİTELİKLİ KİŞİSEL VERİLERİN KORUNMASI VE GİZLİLİĞİNE İLİŞKİN PROSEDÜR	Doküman No	PRS00066
		İlk Yayın Tarihi	06/12/2021
		Revizyon No	00
		Revizyon Tarihi	
		Sayfa No	5/9

6.3.1.1 Transfer of private personal data abroad

As a rule, personal data cannot be transferred abroad without the explicit consent of the Relevant Person. However, in case of existence of one of the reasons for compliance with the law defined in the KVKK, private personal data of third parties abroad may be transferred abroad without explicit consent, under the following conditions:

- Being in countries where there is sufficient protection declared by the KVKK Board,
- If it is located in countries where there is no adequate protection, the data controllers in Turkey and in the foreign country in question must undertake an adequate protection in writing and have the permission of the KVKK Board.

6.3.1.2 Points to be considered in transfer processes

The following issues should be taken into account when transferring private personal data:


- If the data needs to be transferred via e-mail, it must be transferred with an encrypted corporate e-mail address or by using a Registered Electronic Mail (KEP) account,
- If it needs to be transferred via media such as Portable Memory, CD, DVD, it should be encrypted with cryptographic methods and the cryptographic key should be kept in a different environment,
- If transferring is carried out between servers in different physical environments, performing data transfer by establishing a VPN between servers or by sFTP method,
- If it is necessary to transfer the data via written paper, taking necessary precautions against the risks such as theft, loss or viewing of the document by unauthorised persons and sending the document in the form of "confidential documents".

6.4 STORAGE OF PRIVATE PERSONAL DATA

6.4.1 Processing of private personal data in electronic media

Environments where private personal data is processed, stored and/or accessed, and electronic media, the following should be carried out:

- Preserving data using cryptographic methods.
- Keeping cryptographic keys secure and in different environments.
- Securely logging the transaction records of all movements performed on the data.
- Continuously monitoring the security updates of the environments where the data is located, regularly performing/having the necessary security tests, recording the test results.
- If the data is accessed through a software, carrying out user authorisation of this software, conducting regular security tests of these software and recording the test results.
- If remote access to data is required, at least two-stage authentication system must be provided.

	ÖZEL NİTELİKLİ KİŞİSEL VERİLERİN KORUNMASI VE GİZLİLİĞİNE İLİŞKİN PROSEDÜR	Doküman No	PRS00066
		İlk Yayın Tarihi	06/12/2021
		Revizyon No	00
		Revizyon Tarihi	
		Sayfa No	6/9

6.4.2 Processing of private personal data in physical environments

In the physical environment where private personal data is processed, stored and/or accessed, the following should be carried out:

- Ensuring that adequate security measures are taken (against electrical leakage, fire, flood, theft, etc.) according to the nature of the environment where private personal data is stored.
- Preventing unauthorised entry and exit by ensuring the physical security of these environments.

6.5 DELETION, DESTRUCTION OR ANONYMIZATION OF PRIVATE PERSONAL DATA

Private personal data is deleted, destroyed or anonymized in the following cases:

- If it is stipulated in the relevant legal regulation.
- Complete termination of processing purposes related to the relevant process of our company.
- Upon the request of the Relevant Person.

The deletion, destruction and anonymization processes in question will be carried out within the scope of our Company's Personal Data Retention and Disposal Policy, without prejudice to the provisions of the relevant legislation.

Unless otherwise specified by the Board, METRO İSTANBUL A.S. chooses the appropriate method of deleting, destroying or anonymizing private personal data. If it is requested by the Relevant Person, the appropriate method will be chosen by explaining the reason.

6.6 SECURITY OF PRIVATE PERSONAL DATA


6.6.1 Obligations of our company regarding the security of private personal data

METRO İSTANBUL A.S. is obliged to take administrative and technical measures according to technological possibilities and implementation costs for the following:

- To prevent the unlawful processing of private personal data.
- To prevent unlawful access to private personal data.
- To ensure that personal data of special nature is kept in accordance with the law.

6.6.1.1 Technical Measures

- Providing a firewall and gateway for the protection of information technology systems containing private personal data against unauthorised access threats over the internet.
- Subjecting all kinds of software and hardware used for configuration processes in certain periods.
- Restricting access to systems containing private personal data through policies and procedures.
- Use of products that regularly scan the information system network and detect dangers to protect against malware.
- Checking which software and services are running in information networks.

	ÖZEL NİTELİKLİ KİŞİSEL VERİLERİN KORUNMASI VE GİZLİLİĞİNE İLİŞKİN PROSEDÜR	Doküman No	PRS00066
		İlk Yayın Tarihi	06/12/2021
		Revizyon No	00
		Revizyon Tarihi	
		Sayfa No	7/9

- Determining whether there is a breach or should not occur in the information networks.
- Keeping a regular record of all users' transactions (such as log records).
- Reporting security issues as quickly as possible.
- Establishing a formal reporting procedure for employees to report security vulnerabilities in systems and services or threats using them.
- Ensuring the security of environments containing private personal data.
- Evaluation of the adequacy and appropriateness of the security measures taken by the service provider in the cloud system used.
- Paying attention to the supply, development and maintenance of information technology systems.


6.6.1.2 Administrative Measures

- Accurately determining what all private personal data is processed, the probability of the risks that may arise regarding the protection of this data, and the losses to be incurred in case of realisation.
- Providing awareness trainings to ensure that employees take the first action in the event of attacks that may harm the security of private personal data.
- Determining the Company's policies and procedures in order to pre-determine the possible risks regarding the processing of private personal data and to take precautions consistently.
- Keeping private personal data for as long as required by the relevant legislation or for the purpose for which they are processed, ensuring that it is accurate and up-to-date.
- If another data processor is involved in data processing activities that METRO İSTANBUL A.S. has the title of data controller, it has to be ensured that the security level is provided by these persons is at the same level that is provided by METRO İSTANBUL A.S.
- Carrying out periodic and random audits at least once a year or carry them out in order to ensure the implementation of the provisions of the KVKK before METRO İSTANBUL A.S.

6.6.1.3 Measures to be taken for employees who process private personal data

For employees involved in the processing of private personal data, the following should be carried out:

- Providing regular trainings on the law and related regulations and private personal data security.
- Concluding confidentiality agreements.
- Clear definition of the users who have access to the data, the scope and duration of the authorisation.
- Periodic authorisation checks.
- Immediately cancelling the authorisations of employees who have a change of job or quit their job in this field, and in this context, taking back the inventory allocated to them by the data controller.

	ÖZEL NİTELİKLİ KİŞİSEL VERİLERİN KORUNMASI VE GİZLİLİĞİNE İLİŞKİN PROSEDÜR	Doküman No	PRS00066
		İlk Yayın Tarihi	06/12/2021
		Revizyon No	00
		Revizyon Tarihi	
		Sayfa No	8/9

6.6.1.4 Employee responsibilities


METRO İSTANBUL A.S. has the title of data processor in data processing activities carried out within the scope of company activities. Employees are obliged to pay attention to the following matters in the personal data processing processes, within the scope of the procedures and principles mentioned in this Procedure:

- All employees who have access to private personal data must act in accordance with the procedures and principles set forth in this Procedure and other related procedures.
- Employees must perform data processing activities in accordance with the principles of protection of private personal data specified in the KVKK.
- Employees should make sure that the relevant person is informed about the following issues while obtaining the private personal data of the person concerned:
 - ✓ For what purpose private personal data will be processed.
 - ✓ Information regarding the identity of the data controller and its representative, if any.
 - ✓ To whom and for what purpose the processed private personal data can be transferred.
 - ✓ The method of obtaining the data and the legal reason.
 - ✓ Rights arising from the law.
- Employees should ensure that their explicit consent is obtained before processing private personal data of the data subject, unless one of the cases of processing private personal data without the need for explicit consent.
- Employees must take all kinds of technical and administrative security measures to prevent the illegal processing of private personal data.
- Employees must ensure that data transfer is carried out in accordance with the purpose of transfer and not exceeding the purpose of transfer.
- Employees must ensure that private personal data is not accessed by unauthorised persons during data transfer.
- Employees must process data within the scope of the purposes necessitating data processing and without exceeding their limits: If employees become aware of a private personal data breach, they must immediately inform the authorised persons within the company.

6.7 RIGHTS OF THE RELATED PERSON

In accordance with Article 11 of the KVKK, the person concerned has the right to direct his/her applications and requests to our Company regarding the following subjects:

- Learning whether your personal data is processed by our Company.
- If personal data has been processed, do not request information about it.
- Learning the purpose of processing personal data and whether they are used in accordance with its purpose.
- Knowing the third parties to whom personal data is transferred in the country or abroad.
- Requesting correction of personal data in case of incomplete or incorrect processing.
- Requesting the deletion, destruction or anonymization of personal data.
- Requesting notification of the transactions in the 4th and 5th paragraphs to the third parties whose personal data is transferred.

	ÖZEL NİTELİKLİ KİŞİSEL VERİLERİN KORUNMASI VE GİZLİLİĞİNE İLİŞKİN PROSEDÜR	Doküman No	PRS00066
		İlk Yayın Tarihi	06/12/2021
		Revizyon No	00
		Revizyon Tarihi	
		Sayfa No	9/9

- Objecting to the emergence of a result against the person himself by analysing the processed data exclusively through automated systems.
- To request the compensation of the damage in case of loss due to unlawful processing of personal data.

The processes regarding the applications and requests directed to METRO İSTANBUL A.S. by the Relevant Person regarding the aforementioned rights will be carried out in accordance with the procedures and principles in the *METRO İSTANBUL A.S. Relevant Person Application and Request Management Procedure*.

6.8 PUBLICATION AND STORAGE OF THE PROCEDURE

This Procedure herein is stored electronically.

6.9 UPDATE FREQUENCY

This Procedure herein is reviewed at least once a year without notice and updated as needed.

6.10 ENFORCEMENT

This Procedure herein is deemed to have entered into force after its publication within the Company.

7. ENVIRONMENTAL, OHS and ENERGY MEASURES

8. DOCUMENTATION

9. INFORMATION ABOUT REVISIONS

Revision Number	Date	Reason for Change	Prepared By
Rev.0	08.12.2021	First Publication	Kenan ŞAN