



SKT YEDEK PARA VE MAKİNA SANAYİ VE TİCARET ANONİM ŞİRKETİ
PERSONAL DATA PROTECTION AND PROCESSING POLICY

Version 01

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1. INTRODUCTION

1.1. Purpose and Scope of the Policy

Personal Data Protection Law No. 6698 (“Law”) entered into force on 7 April 2016; this SKT Yedek Parça Ve Makina Sanayi Ve Ticaret Anonim Şirketi Personal Data Protection and Processing Policy (“Policy”) aims to ensure the compliance of SKT Yedek Parça Ve Makina Sanayi Ve Ticaret Anonim Şirketi (“SKT” or “Company”) with the Law and to determine the principles to be observed by the Company in fulfilling its obligations relating to the protection and processing of personal data.

The Policy sets out the conditions for the processing of personal data and the main principles adopted by the Company in the processing of personal data. Within this framework, the Policy covers all personal data processing activities carried out by the Company within the scope of the Law, all data subjects whose personal data is processed by the Company, and all personal data processed by the Company.

Matters relating to the processing of personal data of the Company’s **employees** are outside the scope of this Policy and are separately regulated under the **SKT Personal Data Protection and Processing Policy for Employees**.

Definitions relating to the terms used in the Policy are set out in ANNEX-1.

1.2. Entry into Force and Amendment

The Policy has been published on the Company’s website and made available to the public. In the event of any conflict between the provisions set out in this Policy and the legislation in force, primarily the Law, the provisions of the legislation shall apply.

The Company reserves the right to amend the Policy in parallel with legal regulations. The current version of the Policy can be accessed on the Company’s website at <https://www.skt.com.tr/tr>.

2. DATA SUBJECTS, PURPOSES OF PERSONAL DATA PROCESSING AND DATA CATEGORIES REGARDING THE PERSONAL DATA PROCESSING ACTIVITIES CARRIED OUT BY OUR COMPANY

2.1. Data Subjects

Data subjects within the scope of the Policy are all natural persons, other than Company employees, whose personal data is processed by the Company. Within this framework, the categories of data subjects are, in general, as follows:

DESCRIPTION	
Candidate Employee	Natural persons who apply for employment with the Company by sending a CV or through other means
Intern	Natural persons who carry out their mandatory or voluntary internship at the Company
Shareholder/Partner	Natural persons who are the Company’s authorized signatories, members of the board of directors, or shareholders/partners
Supplier’s Employee	Employees of companies from which the Company procures products or services
Supplier’s Authorized Representative	Authorized representatives of companies from which the Company procures products or services
Person Receiving Products or Services	Natural persons who receive products or services from the Company
Other (Customer’s Employee)	Employees of corporate or natural person customers whose personal data is obtained, regardless of whether they have any contractual relationship with the Company
Other (Customer’s Authorized Representative)	Authorized representatives of corporate customers, or the natural person customer himself/herself
Visitor	Natural persons who visit the Company
Third Party	Natural persons other than the data subject categories listed above and the Company’s employees, and family members and relatives of employees

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The categories of data subjects are specified for general information purposes. The fact that a data subject does not fall within the scope of any of these categories does not remove his/her status as a data subject as set out in the Law.

2.2. Purposes of Personal Data Processing

Your personal data and special categories of personal data may be processed by the Company, in compliance with the conditions for the processing of personal data set out in the Law and relevant legislation, for the following purposes:

- Conducting Information Security Processes
- Carrying Out the Selection and Placement Processes of Candidate Employees / Interns / Students
- Carrying Out the Application Processes of Candidate Employees
- Carrying Out Fringe Benefits and Interest Processes for Employees
- Fulfillment of Obligations Arising from Employment Contracts and Legislation for Employees
- Conducting Audit / Ethics Activities
- Carrying Out Access Authorization Processes
- Ensuring Legal Compliance of Activities
- Conducting Finance and Accounting Affairs
- Ensuring Physical Space Security
- Carrying Out Assignment Processes
- Conducting Follow-Up and Execution of Legal Affairs
- Conducting Communication Activities
- Conducting/Supervising Business Activities
- Conducting Occupational Health / Safety Activities
- Carrying Out Business Continuity Activities
- Planning Human Resources Processes
- Receiving and Evaluating Suggestions for the Improvement of Business Processes
- Conducting Logistics Activities
- Carrying Out Goods/Service Procurement Processes
- Carrying Out Goods/Service Sales Processes
- Carrying Out Goods/Service Sales Processes
- Carrying Out Goods/Service Production and Operation Processes
- Conducting Customer Relationship Management Processes
- Carrying Out Activities for Customer Satisfaction
- Organization and Event Management
- Conducting Contract Processes
- Carrying Out Strategic Planning Activities
- Follow-Up of Requests/Complaints
- Ensuring the Security of Movable Property and Resources
- Conducting Supply Chain Management Processes

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- Ensuring the Security of Data Controller Operations
- Carrying Out Investment Processes
- Carrying Out Management Activities
- Creation and Follow-Up of Visitor Records

2.3. Activities Carried Out Regarding the Processing of Personal Data

Information is provided below regarding the personal data processing activities carried out by the Company with respect to data subjects other than employees.

- In the course of **maintenance processes**, identity data may be processed during the issuance of dispatch/delivery notes.
- In the course of **carrying out general assembly processes**, the execution of transactions through the electronic signatures of Company officials, the keeping of the resolution book and the shareholders' book, the follow-up of e-mails received through registered e-mail (KEP) and the National Electronic Notification System (UETS), and the follow-up of data subject applications, identity, contact and financial data relating to customer's employees, customer's authorized representatives, supplier's employees, supplier's authorized representatives, shareholders, members of the board of directors and authorized signatories may be processed.
- **Within the scope of human resources processes;**
 - In the course of **private health insurance** processes, personal data relating to the employee's family may be processed and, where necessary, transferred to suppliers.
 - For the purpose of **carrying out legal affairs**, personal data may be transferred, limited to the relevant purposes, during the appointment of contracted legal counsel and the transfer of information and documents.
 - In the course of **responding to data subject applications**, personal data may be processed and transferred to competent public institutions and organizations.
 - In the course of **carrying out recruitment processes**, job application forms, onboarding documents, identity, contact, professional experience, visual and audio records in the form of photographs and, in the case of disability status, health data may be processed. Identity data of third parties may be processed while filling out reference check forms for the purpose of reference checking.
 - In the course of **subcontractor follow-up processes**, identity, personnel, professional experience and health-related personal data of supplier employees may be processed.
 - For the purpose of **visitor follow-up**, identity data of visitors may be processed.
 - Within the scope of **R&D projects**, identity, contact, professional experience and personnel data of groups other than the employee group may be processed.
 - Within the scope of **occupational health and safety (OHS) activities**, identity data relating to near-miss, hazard notification and occupational accident forms, as well as identity data of visitors, may be processed for the purpose of carrying out occupational health and safety activities.
- Within the scope of **financial affairs**, identity and contact data of shareholders, members of the board of directors and authorized signatories may be processed during banking transactions with banks, credit transactions and the execution of agreements; and identity, contact, financial, personnel, transaction security and customer transaction data may be processed during the filing of tax returns, the keeping of e-ledger records, credit card transactions, invoicing transactions, cheque and promissory note transactions, the opening of current accounts, e-dispatch note/e-archive processes, independent audits, power of attorney transactions and investment transactions.
- In the course of Procurement processes, identity, contact and financial data may be processed during the execution of contract processes, the opening of current accounts, technical documentation and customer registration processes.
- In the course of **continuous improvement, sales and business development processes**, identity, personnel, financial and contact data may be processed due to the signing of contracts, collections, order and CRM transactions and activities relating to customer satisfaction.

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- During **supply chain activities**, identity data may be processed during customs transactions and the filling out of warehouse and maintenance forms.
- Identity, contact and customer transaction data may be processed by the **Materials Directorate** during the conduct of communication activities, investment transactions, offers, requests and matters relating to customer satisfaction.
- In the course of **conducting communication activities**, contact-related personal data is processed.
- In the **Quality and Engineering R&D departments**, identity, personnel, contact and professional experience-related data may be processed during new product launch, the collection of subcontractor employee information, the management of customer complaints, and contract signing and certification processes.
- Within the framework of **monitoring of communications, e-mail and internet traffic**, all internet traffic information may be followed and, where necessary, processed by the Company, pursuant to Law No. 5651 on the Regulation of Publications on the Internet and Combating Crimes Committed by Means of Such Publications, in relation to the internet access provided at the Company's premises and facilities.
- **Certain parts of the Company's buildings and premises may be monitored by security cameras**, and the footage may be processed for the purposes specified in this Employee Policy. Compliance with workplace disciplinary rules, in particular Occupational Health and Safety rules, may also be monitored, and security camera footage may be accessed by authorized Company employees.
- In the course of **receiving e-mail services and using cloud servers**, your personal data may be processed and transferred abroad. Employee data is processed and stored in local folders.
- In the course of **authorization, user accounts and hardware follow-up**, your identity, contact, personnel and transaction security personal data may be processed.
- The Company uses cookies during the use of the **Website** in order to improve user experience and ensure the effective operation of the website. Only mandatory cookies and analytical cookies are collected on the website. Mandatory cookies are necessary for the website to function properly, whereas analytical cookies enable the obtaining of statistical data relating to the use of the website; with respect to analytical cookies, personal data may be processed in line with your consent by enabling the cookie options on the website.

2.4. Categories of Personal Data

Your personal data, categorized below by the Company, is processed in compliance with the conditions for the processing of personal data set out in the Law and relevant legislation:

PERSONAL DATA CATEGORY	DESCRIPTION
Identity	Name and surname, mother's/father's name, mother's maiden name, date of birth, place of birth, marital status, identity card serial/sequence number, Turkish ID number, etc.
Contact	Address number, e-mail address, contact address, registered e-mail address (KEP), telephone number, etc., address
Personnel	Payroll information, disciplinary investigation, onboarding document records, asset declaration information, CV information, performance evaluation reports, employment certificate, military service certificate, working hours, registration number, department, attendance status, leaves, orientation information, competencies, fringe benefits
Legal Transaction	Information in correspondence with judicial authorities, information in case files
Physical Space Security	Entry-exit records of employees and visitors, camera recordings
Transaction Security	IP address information, website login/logout information, password and passcode information, user account information, log records
Risk Management	Information processed for the management of commercial, technical, administrative and occupational safety risks
Finance	Balance sheet information, financial performance information, credit and risk information, asset information, bank account and IBAN information
Customer Transaction	Call center records, invoice, promissory note and cheque information,

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PERSONAL DATA CATEGORY	DESCRIPTION
	information in bank receipts, order information, request information
Professional Experience	Diploma information, courses attended, in-service training information, certificates, transcript information
Visual and Audio Records	Visual and audio recordings, photographs and videos
Health Data	Any health information relating to an identified or identifiable natural person, entry/periodic health reports, disability status, blood type, results of any tests, medical rest/sick leave information, health data relating to occupational accidents, pregnancy, death certificate
Special Categories of Personal Data	Data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, dress and appearance, membership in associations, foundations or trade unions, health, sexual life, criminal conviction and security measures, and biometric and genetic data of persons constitute special categories of personal data. In our Company, health data of employees' family members is processed for the purpose of employees benefiting from fringe benefits, and health data of supplier's employees is processed within the scope of occupational health and safety activities.

3. PRINCIPLES AND CONDITIONS REGARDING THE PROCESSING OF PERSONAL DATA

3.1. Principles Regarding the Processing of Personal Data

Your personal data is processed by the Company in compliance with the principles of personal data processing set out in Article 4 of the Law. Compliance with these principles is mandatory with respect to each personal data processing activity:

- **Processing of personal data in compliance with the law and rules of good faith;** the Company acts in compliance with the laws, secondary legislation and the general principles of law in the processing of your personal data; it attaches importance to processing personal data limited to the purpose of processing and to taking into account the reasonable expectations of data subjects.
- **Personal data being accurate and up-to-date;** attention is paid to whether the personal data processed by the Company is up-to-date, and controls are carried out in this regard. Data subjects are granted the right to request the rectification or erasure of their inaccurate or outdated data in this context.
- **Processing of personal data for specified, explicit and legitimate purposes;** prior to each personal data processing activity, the Company determines the purposes of data processing and ensures that such purposes are not contrary to law.
- **Personal data being relevant, limited and proportionate to the purpose for which it is processed;** the data processing activity carried out by the Company is limited to the personal data necessary to achieve the purpose of collection, and the necessary steps are taken to ensure that personal data unrelated to this purpose is not processed.
- **Personal data being retained for the period stipulated by the relevant legislation or required for the purpose of processing;** personal data is erased, destroyed or anonymized by the Company after the purpose of personal data processing ceases to exist or upon expiry of the period stipulated in the legislation.

3.2. Conditions for Processing of Personal Data

Your personal data is processed by the Company where at least one of the conditions for the processing of personal data set out in Article 5 of the Law is present. Explanations regarding these conditions are set out below:

- **The explicit consent of the data subject** — in cases where the other conditions for data processing do not exist, and in compliance with the general principles set out under heading 3.1, the personal data of the data subject may be processed by the Company where the data subject, being sufficiently informed of the personal data processing activity, gives his/her consent freely, unambiguously and limited only to that transaction.

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- **Where the personal data processing activity is expressly provided for by laws**, personal data may be processed by the Company without the explicit consent of the data subject. In such a case, the Company will process personal data within the framework of the relevant legal regulation.
- **Where the explicit consent of the data subject cannot be obtained due to actual impossibility and the processing of personal data is compulsory**, personal data belonging to the data subject who is unable to explain his/her consent or whose consent is not deemed legally valid shall be processed where it is compulsory to protect the life or bodily integrity of the data subject or of a third party.
- **Where the personal data processing activity is directly related to the establishment or performance of a contract**, the personal data processing activity shall be carried out where it is necessary to process the personal data of the parties to a contract established, or already signed, between the data subject and the Company.
- **Where it is compulsory for the data controller to carry out the personal data processing activity in order to fulfil its legal obligation**, the Company processes personal data for the purpose of fulfilling its legal obligations set out under the legislation in force.
- **Where the data subject has made his/her personal data public**, personal data that has been disclosed to the public in any manner by the data subject and thereby made available to everyone's knowledge as a result of being made public may be processed by the Company, limited to the purpose of such disclosure, even without the explicit consent of data subjects.
- **Where the processing of personal data is compulsory for the establishment, exercise or protection of a right**, the Company may process the personal data of the data subject within the scope of such compulsion, without the explicit consent of the data subject.
- **Where the processing of data is compulsory for the legitimate interests pursued by the data controller, provided that this does not harm the fundamental rights and freedoms of the data subject**, personal data may be processed by the Company provided that the balance of interests between the Company and the data subject is observed. In this context, in processing data based on legitimate interest, the Company first determines the legitimate interest it will obtain as a result of the processing activity. It assesses the possible impact of the processing of personal data on the rights and freedoms of the data subject, and carries out the processing activity where it considers that the balance is not upset.

3.3. Conditions for Processing of Special Categories of Personal Data

Special categories of personal data are set out in a limited and exhaustive manner in Article 6 of the Law. These are data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, dress and appearance, membership in associations, foundations or trade unions, health, sexual life, criminal conviction and security measures, and biometric and genetic data.

The Company may process special categories of personal data, by ensuring that the additional measures determined by the Personal Data Protection Board are taken, in the following circumstances:

The second paragraph of Article 6 of Personal Data Protection Law No. 6698 of 24/3/2016 has been repealed and the third paragraph has been amended as follows. Accordingly, as of 1 June 2024, special categories of personal data may be processed where:

- The data subject has given his/her explicit consent,
- It is expressly provided for by laws,
- It is compulsory for the protection of the life or bodily integrity of the person himself/herself or of another person, who is unable to explain his/her consent due to actual impossibility or whose consent is not deemed legally valid,
- It relates to personal data that have been made public by the data subject himself/herself, and is in compliance with the data subject's intention to make such data public,
- It is compulsory for the establishment, exercise or protection of a right,
- It is necessary for persons under an obligation of confidentiality or competent public institutions and organizations for the purposes of the protection of public health, preventive medicine, medical diagnosis, treatment and care services, and the planning, management and financing of health services,

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- It is compulsory for the fulfilment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance,
- It relates to the current or former members and affiliates of foundations, associations and other non-profit organizations established for political, philosophical, religious or trade union purposes, or to persons in regular contact with such organizations, provided that such processing is in compliance with the legislation to which such organizations are subject and with their objectives, is limited to their fields of activity, and is not disclosed to third parties.

Prior to 1 June 2024, special categories of personal data were processed under the following conditions.

- **Processing of special categories of personal data other than health and sexual life** may be carried out where the data subject gives his/her explicit consent or where it is expressly provided for by laws.
- **Personal data relating to health and sexual life** may only be processed, without seeking the explicit consent of the data subject, by persons under an obligation of confidentiality or competent public institutions and organizations, for the purposes of the protection of public health, preventive medicine, medical diagnosis, treatment and care services, and the planning and management of health services and their financing.

Please see the “Policy on the Protection of Special Categories of Personal Data” for further information.

4. TRANSFER OF PERSONAL DATA

The Company may transfer personal data domestically or abroad, in compliance with the conditions set out in Articles 8 and 9 of the Law and the additional regulations determined by the Personal Data Protection Board, provided that the conditions for the transfer of personal data are met.

- **Transfer of personal data to third parties domestically,**

Your personal data may be transferred by the Company where at least one of the conditions for data processing set out in Articles 5 and 6 of the Law, explained under heading 3 of this Policy, is present, and provided that the basic principles relating to the conditions for data processing are complied with.

Legal Grounds for the Transfer of Personal Data

- Being expressly provided for by laws.
- Being compulsory for the protection of the life or bodily integrity of the person himself/herself or of another person, who is unable to explain his/her consent due to actual impossibility or whose consent is not deemed legally valid.
- Being necessary to process personal data of the parties to a contract, provided that this is directly related to the establishment or performance of the contract.
- Being compulsory for the data controller to fulfil its legal obligation.
- Having been made public by the data subject himself/herself.
- Being compulsory for the establishment, exercise or protection of a right for data processing.
- Being compulsory for the legitimate interests of the data controller, provided that this does not harm the fundamental rights and freedoms of the data subject.

The Company carries out data transfer for the following purposes;

- Carrying Out Fringe Benefits and Interest Processes for Employees
- Conducting Audit / Ethics Activities
- Ensuring Legal Compliance of Activities
- Conducting Finance and Accounting Affairs
- Conducting Follow-Up and Execution of Legal Affairs
- Conducting/Supervising Business Activities
- Carrying Out Goods/Service Procurement Processes

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- Carrying Out After-Sales Support Services for Goods/Services
- Carrying Out Activities for Customer Satisfaction
- Providing Information to Authorized Persons, Institutions and Organizations
- Carrying Out Management Activities
- **Transfer of personal data to third parties abroad**

Personal data may be transferred abroad by data controllers and data processors where one of the conditions specified in Articles 5 and 6 of the Law is present and there is an adequacy decision regarding the country, sectors within that country, or international organizations to which the transfer will be made.

In the absence of an adequacy decision, personal data may be transferred abroad by data controllers and data processors, provided that one of the conditions specified in Articles 5 and 6 is present, that the data subject retains the ability to exercise his/her rights and access effective legal remedies in the country to which the transfer is made, and that one of the following appropriate safeguards is ensured by the parties:

- The existence of an **agreement, which is not classified as an international convention**, between public institutions and organizations or international organizations abroad and public institutions and organizations or professional organizations with public institution status in Türkiye, **and the Board's approval for the transfer**.
- The existence of **binding corporate rules**, approved by the Board, containing provisions on the protection of personal data, which companies within a group of undertakings engaged in joint economic activities are obliged to comply with.
- The existence of a **standard contract**, published by the Board, containing matters such as data categories, the purposes of the data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data recipient, and additional measures taken for special categories of personal data.
- The existence of a **written commitment** containing provisions ensuring adequate protection, **and the Board's approval for the transfer**.

In the absence of an adequacy decision and where none of the appropriate safeguards described above can be ensured, personal data may only be transferred abroad, provided that such transfer is incidental, in one of the following cases:

- The data subject has given explicit consent to the transfer, provided that he/she has been informed of the possible risks involved.
- The transfer is compulsory for the performance of a contract between the data subject and the data controller, or for the implementation of pre-contractual measures taken upon the request of the data subject.
- The transfer is compulsory for the establishment or performance of a contract to be concluded between the data controller and another natural or legal person, for the benefit of the data subject.
- The transfer is compulsory for an overriding public interest.
- The transfer of personal data is compulsory for the establishment, exercise or protection of a right.
- The transfer of personal data is compulsory for the protection of the life or bodily integrity of the person himself/herself or of another person, who is unable to explain his/her consent due to actual impossibility or whose consent is not deemed legally valid.
- The transfer is made from a registry that is open to the public or to persons with a legitimate interest, provided that the conditions for accessing the registry under the relevant legislation are fulfilled and the person with a legitimate interest so requests.

Personal data transferred abroad by the data controller and data processors are also subject to the safeguards set out in this Law and the provisions of this Article with respect to onward transfers and transfers to international organizations.

Without prejudice to the provisions of international conventions, personal data may only be transferred abroad with the approval of the Board and after obtaining the opinion of the relevant public institution or organization, in cases where the interests of Türkiye or of the data subject would be seriously harmed.

- **Transfer of Personal Data Abroad by SKT**

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Transfers Made Through a Standard Contract

Our Company uses e-mail and cloud-based information technology infrastructures of foreign origin. In this context, by executing the standard contract published by the Board pursuant to Article 9/4(c) of Law No. 6698 with the data processor and notifying it to the Authority, your identity, contact, personnel, legal transaction, transaction security, risk management, finance, professional experience, visual and audio records, and criminal conviction and security measures and health data may be transferred abroad.

Transfers Made to Sub-Data Processors

Due to our Company's use of e-mail and cloud-based information technology infrastructure services of foreign origin, your personal data may be transferred to these service providers and their sub-data processors. In these transfer processes, the appropriate safeguards stipulated under Article 9 of the Law are ensured; the necessary technical and administrative measures are taken within the framework of the standard contracts executed between the data controller and the data processor and notified to the Authority. Details relating to the sub-data processors are set out in the relevant standard contracts.

Incidental Transfers

Pursuant to Article 9/6(a) of the Law, provided that it is incidental, and where the data subject is informed of the possible risks and his/her explicit consent is obtained, or the other conditions stipulated in the Law are fulfilled, your personal data may be transferred to third parties such as customers and suppliers abroad within the scope of accounting and finance, travel, communication activities and procurement processes.

CATEGORY OF RECIPIENT	SCOPE	PURPOSE OF TRANSFER
Public Institutions and Organizations Authorized by Law	Authorized public institutions and organizations	Sharing of personal data limited to the purpose of requesting information by the relevant public institutions and organizations
Natural Persons or Private Law Legal Entities	Customers	Transfer of data limited to the extent necessary for the Company to carry out its activities. Transfers to customers located abroad may be made provided that one of the conditions set out in Articles 5 and 6 of the Law is present and the data subject has the ability to exercise his/her rights and access effective legal remedies in the country to which the transfer is made. Transfers abroad that are considered incidental and non-continuous may be made following the taking of the necessary measures and the fulfilment of the conditions set out in the Law.
Shareholders	Natural or legal persons holding shares in the Company	Transfer of data limited to the extent necessary for the Company to carry out its activities
Suppliers	Third-party natural or legal persons providing services or products to the Company	Transfers to suppliers located abroad may be made provided that one of the conditions set out in Articles 5 and 6 of the Law is present and the data subject has the ability to exercise his/her rights and access effective legal remedies in the country to which the transfer is made. Transfers abroad that are considered incidental and non-continuous may be made following the taking of the necessary measures and the fulfilment of the conditions set out in the Law.
Public at Large	Social media platforms, the Company's website	Within the scope of the promotion of Company activities and the conduct of corporate communication processes, personal data may be shared through the sharing of photograph and video content relating to events, organizations and business processes on the website, social media accounts and other platforms open to the public. The consent of the relevant data subject is sought in such cases.
Holding	Diniz Holding	Since our Company is part of the same holding and/or group, personal data may be shared with group companies, where

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CATEGORY OF RECIPIENT	SCOPE	PURPOSE OF TRANSFER	
		necessary, for the purposes of conducting business activities, planning and management of intra-group operations, and conducting audit and reporting processes. Such data transfer activities are carried out in compliance with the conditions set out in Articles 8 and 9 of Law No. 6698, and the necessary technical and administrative measures are taken during the transfer process.	
Group Companies	Companies affiliated with Diniz Holding	Since our Company is part of the same holding and/or group, personal data may be shared with group companies, where necessary, for the purposes of conducting business activities, planning and management of intra-group operations, and conducting audit and reporting processes. Such data transfer activities are carried out in compliance with the conditions set out in Articles 8 and 9 of Law No. 6698, and the necessary technical and administrative measures are taken during the transfer process.	

5. INFORMING OF DATA SUBJECTS AND RIGHTS OF DATA SUBJECTS

Pursuant to Article 10 of the Law, data subjects must be informed about the processing of their personal data before, or at the latest at the time of, the processing of personal data. Pursuant to the relevant Article, the necessary internal structure has been established by the Company, acting as the data controller, to ensure that data subjects are informed in every instance in which a personal data processing activity is carried out. In this context;

- Please see Section 2.2 of the Policy for the purpose of processing of your personal data.
- Please see Section 4 of the Policy for the parties to whom your personal data is transferred and the purpose of such transfer.
- Please see Sections 3.2 and 3.3 of the Policy to review the conditions relating to the processing of your personal data, which may be collected through different channels in physical or electronic environments.
- As a data subject, we would like to state that you have the following rights pursuant to Article 11 of the Law:
- To learn whether your personal data is processed or not,
- To request information as to whether your personal data has been processed,
- To learn the purpose of the processing of your personal data and whether it is used in accordance with such purpose,
- To know the third parties, in the country or abroad, to whom your personal data is transferred,
- To request the rectification of incomplete or inaccurate data, if any, and to request that the transaction carried out in this context be notified to third parties to whom your personal data has been transferred,
- To request the erasure or destruction of personal data in the event that the reasons requiring processing cease to exist, although processed in accordance with the Law and other relevant laws, and to request that the transaction carried out in this context be notified to third parties to whom your personal data has been transferred,
- To object to the occurrence of a result against you by analyzing the processed data solely through automated systems,
- To claim compensation for the damage arising from unlawful processing of your personal data.

You may submit your applications regarding the rights listed above to our Company by completing the **Data Subject Application Form**, available at <https://www.skt.com.tr/tr>. Your applications will be concluded free of charge, as soon as possible and at the latest within thirty days, depending on the nature of your request; however, if the transaction requires an additional cost, a fee may be charged in accordance with the tariff to be determined by the Personal Data Protection Board.

In evaluating applications, the Company primarily determines whether the applicant is the true right holder. In addition, the Company may request detailed and additional information where deemed necessary, in order to better understand the request.

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Responses to data subject applications are notified by the Company to data subjects in writing or by electronic means. In the event that the application is rejected, the grounds for rejection shall be explained to the data subject.

Where personal data is not obtained directly from the data subject, the Company informs the data subjects (1) within a reasonable period following the acquisition of the personal data, (2) at the time of the first contact, in case the personal data is to be used for the purpose of communication with the data subject, or (3) at the time of the first transfer at the latest, if the personal data is to be transferred.

6. ERASURE, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

Pursuant to Article 7 of the Law, in the event that the reasons requiring the processing of personal data cease to exist, although the personal data has been processed in compliance with the Law, the Company shall erase, destroy or anonymize such personal data, ex officio or upon the request of the data subject, in accordance with the guidelines published by the Authority.

7. RESTRICTIONS REGARDING THE SCOPE AND APPLICATION OF THE LAW

The following circumstances fall outside the scope of the Law:

- Processing of personal data by natural persons within the scope of activities relating purely to themselves or to family members living in the same dwelling, provided that the data is not disclosed to third parties and the obligations relating to data security are complied with.
- Processing of personal data for purposes such as research, planning and statistics by anonymizing it with official statistics.
- Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that national defense, national security, public security, public order, economic security, privacy of private life or personal rights are not violated and it does not constitute a crime.
- Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized and assigned by law to ensure national defense, national security, public security, public order or economic security.
- Processing of personal data by judicial authorities or execution authorities in relation to investigation, prosecution, adjudication or execution proceedings.

In the following cases, the Company is not required to inform data subjects, and data subjects will not be able to exercise their rights set out in the Law, except for their right to claim compensation for damages:

- Where the processing of personal data is necessary for the prevention of a crime or for a criminal investigation.
- Processing of personal data that has been made public by the data subject himself/herself.
- Where the processing of personal data is necessary for the performance of supervisory or regulatory duties and disciplinary investigation or prosecution, by competent and authorized public institutions and organizations and professional organizations with public institution status, based on the authority granted by law.
- Where the processing of personal data is necessary for the protection of the State's economic and financial interests relating to budgetary, tax and financial matters.

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ANNEX-1: DEFINITIONS

TERM	DEFINITION
Personal Data	Any information relating to an identified or identifiable natural person.
Special Categories of Personal Data	Data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, dress and appearance, membership in associations, foundations or trade unions, health, sexual life, criminal conviction and security measures, and biometric data.
Personal Health Data	Any health information relating to an identified or identifiable natural person.
Data Subject / Relevant Person	The natural person whose personal data is processed.
Employee	Natural persons employed by the Company as employees or interns, under fixed-term/indefinite-term, full-time/part-time employment contracts or other contracts.
Candidate Employee	Natural persons who are not Company employees but are in the status of candidate employee of the Company through various methods.
Intern	Natural persons who are not Company employees but carry out an internship at the Company.
Processing of Personal Data	Any operation performed on personal data, such as collection, recording, storage, preservation, alteration, reorganization, disclosure, transfer, acquisition, making available for retrieval, classification or prevention of use, whether wholly or partly by automated means, or by non-automated means, provided that it forms part of a data recording system.
Explicit Consent	Consent relating to a specific matter, based on information and expressed with free will.
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.
Data Processor	The natural or legal person who processes personal data on behalf of the data controller, based on the authority granted by the data controller.
Personal Data Processing Inventory	The inventory that SKT prepares by associating its personal data processing activities, carried out based on the business processes of data controllers, with the purposes of personal data processing, the data category, the recipient group to whom data is transferred and the group of persons the data concerns, and that details the maximum period necessary for the purposes for which the personal data is processed, the personal data envisaged to be transferred to foreign countries, and the measures taken relating to data security.
Personal Health Data	Any health information relating to an identified or identifiable natural person.
PDP Law	Personal Data Protection Law No. 6698 of 24 March 2016.
Constitution	The Constitution of the Republic of Türkiye No. 2709.
PDP Board	The Personal Data Protection Board of the Authority.
PDP Authority	The Personal Data Protection Authority.
Policy	SKT Yedek Parça Ve Makina Sanayi Ve Ticaret Anonim Şirketi Personal Data Protection and Processing Policy.
Company / SKT	SKT Yedek Parça Ve Makina Sanayi Ve Ticaret Anonim Şirketi.
Holding	Diniz Holding.
Group Companies	Companies affiliated with Diniz Holding.
Business Partners	Persons with whom SKT Yedek Parça Ve Makina Sanayi Ve Ticaret Anonim Şirketi has entered into partnerships within the scope of contractual relationships in connection with its commercial activities.

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ANNEX-2

CATEGORIES OF DATA RECIPIENTS	
Public Institutions and Organizations Authorized by Law	From public institutions and organizations legally authorized to obtain information and documents from the Company: Social Security Institution, Courts, Ministry of Labor and Social Security, Tax Office, Trade Registry Directorate, Turkish Employment Agency, Revenue Administration, Notaries Public, Consulates, Governorships, General Directorate of Security, relevant Ministries, relevant Public Institutions
Private Law Legal Entities	Suppliers, Customers, Independent Audit Firm, Financial Advisor, Customs Companies, Bank, Insurance Companies, Information Technology Companies, Audit Firms, Law Firms, Quality Certification Company, Cargo Companies, Transport and Logistics Companies, Advertising and Printing Companies, Industrial Zones, Travel Agency, Authorized Training Institutions and Organizations, Telecommunications Companies, Trade Union, Payroll, Personnel Attendance Control, Consultancy Companies, Corporate Solutions Companies
Abroad	Social media platforms, the Company's website