

TÜRK TUBORG BIRA VE MALT SANAYİ ANONİM ŞİRKETİ
POLICY ON PROTECTION AND PROCESSING OF PERSONAL DATA

I. PURPOSE AND SCOPE

This Policy on Protection and Processing of Personal Data (“Policy”) prepared by Türk Tuborg Bira ve Malt Sanayi Anonim Şirketi (“**Company**”) aims to determine terms and conditions with regards to obtaining, recording, storing, keeping, amending, reorganizing, disclosing, transferring, undertaking, making obtainable, classifying or preventing usage of personal data in line with laws and in scope of Personal Data Protection Law numbered 6698 and related secondary legislation (“PDPL”).

All units, departments, employees, officials and representatives of this Company are obliged to comply with this Policy and take necessary measures to ensure compliance.

All personal data shared with the company and obtained by the company and personal data related to former, current and prospective employees, authorities, representatives, partners, customers, suppliers, business partners, consultants, service providers and their employees, company facility and internet website visitors and all other real persons related to the company constitute the subject matter of this Policy. This policy is related only to personal data of real persons and data of legal persons doesn’t fall in this scope.

Provisions of legislation apply in case of irregularities between this Policy and PDPL and other legislations.

II. DEFINITIONS

In practice of this Policy, the terms used herein shall have the following meanings:

- Explicit Consent** : Freely given specific and informed consent
- Anonymization** : Rendering personal data by no means identified or identifiable with a natural person even by linking with other data
- Deletion** : Making personal data inaccessible and reusable for users
- Personal Data** : Any information relating to an identified or identifiable natural person
- Processing of personal data** : Any operation which is performed upon personal data such as collection, recording, storage, preservation, alteration, adaptation,

disclosure, transfer, retrieval, making available for collection, categorization or blocking its use by wholly or partly automatic means or otherwise than by automatic means which form part of a filing system

Personal data keeping and destruction policy	:	Policy taken as basis for deletion, elimination and anonymization and to determine maximum times needed for the purpose of personal data processing
PDPL	:	Personal Data Protection Law numbered 6698 and related secondary legislation
Board	:	The Board of Protection of Personal Data
Special personal data	:	Data relating to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade-union, health, sexual life, criminal conviction and security measures, and biometrics and genetics are special categories of personal data
Policy	:	This Personal Data Protection and Processing Policy
Company	:	Türk Tuborg Bira ve Malt Sanayi Anonim Şirketi
Destruction	:	Making personal data inaccessible, irretrievable and reusable ever again by anyone

III. PRINCIPLES RELATED TO THE PROCESSING OF PERSONAL DATA

The below principles of PDPL shall always and in any case apply to the processing of personal data at the company;

1. Being in conformity with the law and good faith.
2. Being accurate and if necessary, up to date.
3. Being processed for specified, explicit, and legitimate purposes.
4. Being relevant, limited and proportionate to the purposes for which data are processed.
5. Being stored only for the time designated by relevant legislation or necessitated by the purpose for which data are collected.

IV. RIGHTS AND RESPONSIBILITIES RELATED TO PERSONAL DATA

1. Enlightening owners of personal data

During obtaining personal data by the company, the related person is informed clearly and understandably regarding, (i) the identity of the data controller and if any, its representative, (ii) the purposes for which personal data will be processed, (iii) the persons to whom processed personal data might be transferred and the purposes for the same, (iv) the method and legal cause of collection of personal data, and (v) rights of the personal data owner under this policy as per section [IV/2].

The Company prepares a text including the above issues and fulfils the obligation of informing the related personal data owner.

2. Rights of data subject against the company

Every real person whose information is processed by the company has the below rights against the company in relation to these data;

- a) Learn whether or not her/his personal data have been processed,
- b) Request information as to processing if her/his data have been processed,
- c) Learn the purpose of processing of the personal data and whether data are used in accordance with their purpose,
- ç) Know the third parties in the country or abroad to whom personal data have been transferred,
- d) Request rectification in case personal data are processed incompletely or inaccurately,
- e) Request deletion or destruction of personal data if reasons for processing the personal data are eliminated,
- f) Request notification of the operations made as per indents (d) and (e) to third parties to whom personal data have been transferred,
- g) Object to occurrence of any result that is to her/his detriment by means of analysis of personal data exclusively through automated systems,
- ğ) Request compensation for the damages in case the person incurs damages due to unlawful processing of personal data.

3. Method of exercising rights

The data subject who wishes to exercise rights under section [IV/2] shall convey her/his requests relating to their application by using the application form in the attachment of this policy along with ID documents and send them to (i) Kemalpaşa Cad. No: 258 35070 Işıkkent – Bornova Izmir with wet signature by hand or through public notary or (ii) other methods to be defined by Board of Protection of Personal Data.

The application must be personally done by the real person whose data is processed; the request must be legible, clear and understandable; name-surname, contact and e-mail addresses of applicant must exist besides ID information. For a third party to apply on behalf of a real person whose personal data is processed, the real person whose data is processed must submit to the Company a power of attorney that clearly states that this person is authorized to apply on his/her behalf through a public notary in line with procedures.

The requests sent to the Company by fulfilling the conditions above shall be concluded within 30 days at the latest and applicant is notified via –email. Additional information and documents may be requested if needed to the assessment of application.

If the transaction in scope of fulfilling rights related to personal data requires a cost, the Company may ask the applicant to pay a fee in line with a tariff to be defined by the Board. Fee is not charged if the application was made by mistake by the Company and the received fee is reimbursed to the related person.

In case the application is rejected, replied insufficiently, or not replied in due time; the data subject may file a complaint with the Board within 30 days following the date he/she learns the reply of the data controller and in any event, within 60 days following the date of application.

Requests of company employees to exercise their rights on personal data are submitted through a letter addressed to the HR department with wet signature and registered e-mail address. Assessment and conclusion of the application is done in line with the procedure detailed above.

4. Ensuring data security

Including but not limited to the below issues on protection of data security, the company takes all kinds of measures needed to ensure data security or those foreseen by PDPL or related legislation;

a. Technical measures

The Company installs or employs others to install the necessary technical infrastructure for registering personal data, transferring them to third parties, deletion, destruction, anonymization and any other method of processing.

The company prepares technical infrastructure and takes necessary technical measures to ensure the security of registered personal data. These measures are updated in line with technological advancements and standards to be defined as per new legislation to be passed by the Board.

The company restricts external access to its internal systems and takes technical measures such as firewalls and similar. Inappropriate access is momentarily notified to related departments and these departments made the necessary interventions.

Authorities related to access and processing of personal data through programs used in the company are limited on an employee-on-duty basis.

The technical infrastructure is regularly inspected and reported.

The company employs expert personnel regarding these technical measures or supplies this service from third parties if needed. The company provides the institutions and suppliers in the trait of third person which The Company obtains service from to comply with related legal regulations under all services including but not limited to technical infrastructure services.

b. Administrative measures

Employees, officials and representatives of the company are trained and informed on legal processing of personal data. Also, employees are obliged to comply with liabilities as per PDPL based on the company protocols they sign with the company.

Company activities are assessed on a department basis and process and principles of personal data processing is detailed specifically for each department. The company determines measures to be taken for each department and applies these through department trainings.

If service is supplied from third parties or collaboration is made with third parties for storing or other methods of processing of personal data, agreements signed with these persons contain provisions on appropriate way of storing, processing and securing personal data legally.

In compliance with legal provisions the Company shall take action and apply relative measures in order to ensure security of personal data ex officio.

V. PROCESSING OF PERSONAL DATA

1. Purpose of processing personal data

The company processes personal data it obtains for the purposes below.

- Carrying out daily activities of the company,
- Fulfilment of obligations of the company arising from legislation or other legal obligations which includes providing information to authorized public bodies and institutions including Ministry of Agriculture and Forestry of Turkey and the Competition Authority,
- Carrying out legal and commercial relations related to former, current and prospective employees, authorities, representatives, partners, customers, suppliers, business partners, consultants, service providers, signing agreements in this respect and processing personal data of related parties to conduct the execution of these signed agreements,
- Execution of marketing activities of the company,
- Determining the preferences and needs of former, current and prospective employees, authorities, representatives, partners, customers, suppliers, business partners, consultants, service providers and their employees,

- Informing former, current and prospective employees, authorities, representatives, partners, customers, suppliers, business partners, consultants, service providers on business and issues related to the company,
- Executing corporate communication and management activities,
- Executing investor relations,
- Strengthening communication and collaboration within the company,
- Carrying out human resources processes including recruitment, performance evaluation, process on starting work, notification and applications to related bodies and proceedings on private pension,
- Fulfilling obligations in terms of work health and safety legislation,
- Execution of corporate governance activities,
- Execution of financial reporting,
- Execution of risk management,
- Execution of accounting, invoicing and payments,
- Execution of reporting within the company,
- Execution of processes related to corporate law,
- Follow up of lawsuits, execution, administrative and penal investigation, prosecution and similar processes of the company,
- Management of customer feedback and complaints and call center services,
- Ensuring security at company facilities and keeping visitor logs in this respect,
- Execution of information technologies,
- Ensuring data security within the company.

2. Categories of personal data to be processed

The below personal data may be processed by the company in line with PDPL and this Policy on condition that they are not restrictive;

- a.** In scope of purposes given under Section [V.1] and to carry out daily and corporate communication activities of the company; all personal data within electronic e-mail accounts and all data in electronic database of the company that are needed to conduct business activities are open to the access of the company and these are logged and processed by the company.

- b.** In scope of purposes given under Section [V.1], execution of daily, legal and commercial relations of the company, signing agreements in this respect, fulfilment of obligations arising from agreements and/or legislation, carrying out marketing activities of the company, determining preference and needs of persons; ID information, contact information and financial information (if needed) regarding former, current and prospective partners, customers, dealers, suppliers, business partners, consultants, service providers, visitors and their employees are obtained, logged and processed.

Whole or part of these personal data may be transferred to customers, dealers, suppliers, business partners, consultants, service providers in order to carry out daily, legal and commercial relations of the company, signing agreements in this respect, fulfilment of obligations arising from agreements and/or legislation, carrying out marketing activities of the company, determining preference and needs of persons by the Company and they may be processed by these persons.

These personal data may be transferred to Ministry of Agriculture and Forestry of Turkey and similar public bodies and institutions to fulfil obligations arising from law and they may be processed by these institutions.

- c.** In scope of purposes given under Section [V.1] and to carry out human resources processes; ID, contact and communication information and personal information of former, current and prospective employees, authorities, representatives, and especially their names, surnames, date of birth, gender and ID number and similar personal data, photos and address and phone numbers are obtained, logged and processed.

These personal data may be transferred to Social Security Institution and similar public bodies and institutions to fulfil obligations arising from law and they may be processed by these institutions.

These personal data may take place in systems allocated to the employees by the company and in the database module allocated to the HR department; these personal data may be accessed and processed to strengthen communication and collaboration within the company.

These personal data may be transferred to contracted sub-employers, consultants and business partners in the sectors of travel agency, IT, technical support to receive these services and for infirmary, ambulance, security and consultancy services through sub-employers and they may be processed by sub-employers, consultants and business partners.

ID information and IBAN among these personal data may be transferred to banks in scope of payments to be made to employees, officials and representatives and these data may be processed by banks.

ID information and contact information may be transferred to insurance and private pension companies to conduct insurance policies and private pension transactions and these data may be processed by these companies.

Driver's license and contact information of employees who are allocated cars by the company may be transferred to the leasing company from which the company receives leasing services and this information may be processed by these companies.

Also, personal data of company employees may be transferred to other company employees through HR system in order to strengthen communication and collaboration within the company.

- d.** In scope of purposes given under Section [V.1] and especially carrying out human resources processes; personal data obtained through career and employment support websites from former, current and prospective employees, authorities and representatives are logged and processed.

This personal data may take place in systems allocated to the employees by the company and in the database module allocated to the HR department; these personal data may be accessed and processed by company employees to strengthen communication and collaboration within the company.

- e.** In scope of purposes given under Section [V.1] and especially determining minimum living allowance, purposes related to HR such as private health insurance and private pension and to strengthen communication and collaboration within the company; ID information of former, current and prospective employees, authorities, representatives and their spouses and children and relatives are obtained, logged and processed.

This personal data can be transferred to official public bodies and institutions, private health insurance and private pension companies to carry out legislative obligations and HR processes and can be processed by these bodies and institutions, the company and persons.

This personal data can be transferred to other Company employees to strengthen communication and collaboration within the company.

- f.** In scope of purposes given under Section [V.1] and especially as part of HR processes to fulfil health services in the company; data obtained through health forms filled in during office doctor visitations under sub-employer by current and prospective employees, authorities, representatives are logged by related sub-employer and the company and are processed.

This personal data can be transferred to company database to fulfil office health services through sub-employer.

- g.** In scope of purposes given under Section [V.1] and especially for management of customer feedback and complaints and call center services; personal data of customers are obtained through call center and/or electronic forms and texts and these are logged and processed.

- h.** In scope of purposes given under Section [V.1] and especially for ensuring security at company facilities; personal data of visitors of the company facilities are obtained, logged and processed. This data can be accessed by Security Companies from which security services are procured.
- i.** In scope of purposes given under Section [V.1] and especially for execution of information technologies; personal data of the internet website visitors of the company are logged and processed.
- j.** In scope of purposes given under Section [V.1] and especially for ensuring security at company facilities; factory and facilities of the company are monitored with cameras and these images are kept in digital environment. The company aims to protect benefits of personnel and other persons with regards to security by the monitoring activity through security cameras. Monitoring activity through security cameras is done as per Law on Private Security Services and related legislation. Regarding monitoring activity through security cameras; this Policy is published in the website of the company and a notification text is placed on entrances of areas that shall be monitored to explain that these areas shall be monitored. Monitoring areas and number of cameras are limited for the purpose of security. Areas (such as WC) that exceed the purpose of security and which may violate personality rights are not subject to monitoring. The recorded and logged records in digital environment can only be accessed by authorized company personnel and employees of the security company the company receives security services from.
- k.** In scope of purposes given under Section [V.1] and especially for fulfillment of security services at company facilities; personal data is processed for the follow up of visitor entry and exits. A visitor card is given to company visitors in exchange for IDs and names, surnames, ID numbers, dates and place of birth of these persons are obtained while also requesting health information from visitors who shall enter production zones in line with legislation. These data subjects are informed through texts written on the walls. Data obtained for visitor entry and exits are only processed for this purpose.
- l.** In scope of purposes given under Section [V.1] and especially for ensuring security and for other legal purposes, internet access may be provided for requesting visitors in the company zone. Log records for internet access are kept as per Law numbered 5651 and provisions of legislation prepared as per this law; these logs are processed in order to fulfil legal responsibility for audit processes in the company or if authorized public bodies and institutions request this information. Only a limited number of company and authorized suppliers' IT employees can access these logs. These company employees who have log access can only access them to respond to authorized public bodies or to use in audit processes and share them with legally authorized persons.
- m.** In scope of purposes given under Section [V.1], your personal data may be shared with our company subsidiary and business partner Tuborg Pazarlama A.Ş. in scope of management partnership for execution of business.

- n. In compliance with the legal provisions, in scope of purposes given under Section [V.1], your personal data may be shared with the business partners whom provide technical infrastructure and support to Company in scope of management partnership for execution of business.

3. Explicit Consent in Processing Personal Data

It is essential to receive the explicit consent of a person in processing of personal data.

In scope of explicit consent exceptions stipulated by the PDPL, personal data may be processed by the company without seeking the explicit consent of a person in case one of the terms below exists;

- a) It is expressly permitted by any law
- b) It is necessary in order to protect the life or physical integrity of the data subject or another person where the data subject is physically or legally incapable of giving consent
- c) It is necessary to process the personal data of parties of a contract, provided that the processing is directly related to the execution or performance of the contract
- d) It is necessary for compliance with a legal obligation which the controller is subject to
- e) The relevant information is revealed to the public by the data subject herself/himself
- f) It is necessary for the institution, usage, or protection of a right
- g) It is necessary for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the data subject are not harmed

Existence of one of these conditions doesn't eliminate the obligation of the Company to inform the personal data owner.

4. Conditions for Processing of Special Categories of Personal Data

It is prohibited to process special categories of personal data without obtaining the explicit consent of the data subject. Specific personal data other than personal data relating to health and sexual life may be processed without obtaining the explicit consent of the data subject if processing is permitted by any law.

5. Transfer of personal data

Personal data obtained by the company can be transferred to third parties in line with purposes under section [V.2].

It is prohibited to process special categories of personal data without obtaining the explicit consent of the data subject.

Personal data may be processed without obtaining the explicit consent of the data subject if one of the below conditions exists:

- a) It is expressly permitted by any law
- b) It is necessary in order to protect the life or physical integrity of the data subject or another person where the data subject is physically or legally incapable of giving consent
- c) It is necessary to process the personal data of parties of a contract, provided that the processing is directly related to the execution or performance of the contract
- d) It is necessary for compliance with a legal obligation which the controller is subject to
- e) The relevant information is revealed to the public by the data subject herself/himself
- f) It is necessary for the institution, usage, or protection of a right
- g) It is necessary for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the data subject are not harmed

Specific personal data other than personal data relating to health and sexual life, may be transferred to third parties without obtaining the explicit consent of the data subject if processing is permitted by any law.

Existence of one of these conditions doesn't eliminate the obligation of the Company to inform the personal data owner.

6. Transfer of personal data abroad

Personal data shall not be transferred abroad without obtaining the explicit consent of the data subject.

Existence of terms under section (i) part [V] article 4, (ii) the foreign country to whom personal data will be transferred has an adequate level of protection or if the data controllers in Turkey and abroad commit, in writing, to provide an adequate level of protection and (iii) the permission of the Board exists, personal data may be transferred abroad without seeking the explicit consent of the data subject.

Transfer of appropriately anonymized personal data do not constitute subject of this Policy.

7. Deletion, Destruction, and Anonymization of Personal Data

Personal data obtained by the company is stored for a time frame foreseen in terms of personal data storing/using if provided by legislation; if such times are not foreseen in legislation, they are stored as much as the time needed for the purpose of the processing of this data by the company or time lapse defined for exercising a right depending on the personal data in any case.

If reasons that require the personal data to be processed are eliminated, this personal data is either deleted, or destructed or anonymized in the first periodical destruction transaction that follows the elimination of reasons, in line with Personal Data Storage and Destruction Policy prepared by the Company.

If the company has never signed an agreement with the data subject, if this agreement is not valid, it automatically expires, terminates or is reneged, or if processing of this personal data violates laws or integrity; these are all examples of reasons of elimination that require the processing of personal data.

If the person whose personal data is processed applies to the data controller to exercise his/her rights on deletion, destruction or anonymization as per PDPL, the company informs the person within 30 days after assessing the related application. If all terms on processing personal data have been eliminated, the company accepts the application and destructs the data within due time. If not all terms on processing personal data have been eliminated, this request is rejected in writing in due time by giving an explanation.

VI. PUBLICATION AND UPDATING OF THE POLICY

This policy is published on official website of the company (<http://www.turktuborg.com.tr>) and is opened to the access of personal data owners upon request.

This policy is updated when needed.

VII. ENFORCEMENT

This policy has entered into force after being prepared by the company.

ANNEX-1: Application Form for Exercising Rights of Data Owners in scope of Law on Protection of Personal Data numbered 6698

ANNEX-1

DATA SUBJECT APPLICATION FORM IN SCOPE OF PERSONAL DATA PROTECTION LAW NUMBERED 6698

Article 13 of Personal Data Protection Law numbered 6698 (“PDPL”) grants the right to make certain requests regarding the processing of personal data under article 11 of the same law, to owners of data that are referred to as “Data Subject” (hereinafter referred to as “**Applicant**”) by applying to data controllers.

Accordingly, if you wish to exercise your rights under PDPL, we kindly ask you to fill in this form and send your request to Türk Tuborg Bira ve Malt Sanayi Anonim Şirketi (“**Tuborg**” or “**Company**”) as the data controller. In scope of paragraph 1 of article 13 of PDPL and Communique on Terms and Conditions on Applying to the Data Controller (“Communique”), you may submit your application form along with the printed copy of your form with wet signature and your ID documents to the company address of Kemalpaşa Caddesi no: 258 Işıkkent, Bornova, İzmir or through your company registered e-mail address in the system which was previously informed to the company via your secure electronic signature or mobile signature to the address of turktuborg@hs01.kep.tr (KEP).

Tuborg shall announce how the applications will be received through various methods after other application methods to be defined by the Personal Data Protection Board are announced.

In order for the application to reach the related department directly, “Information Request in scope of Personal Data Protection Law” must be written in the subject section of e-mails for applications to be made through e-mails which is one of the methods above and on the envelope for physical applications.

Applications to be made in scope of paragraph 2 of article 4 of the Communique need to be in Turkish.

Your application shall be swiftly assessed by Tuborg and shall be responded to in writing or in electronic environment within 30 days as from the date when your application in scope of PDPL and Communique provisions reach/are served to Tuborg.

Although Tuborg does not claim any charges for these applications by rule, fees to be defined by the Board may be requested if this transaction requires an additional cost.

You shall be contacted for clarification if your application lacks in information or documents or if it is incomprehensible.

1. YOUR ID AND CONTACT INFORMATION OF THE APPLICANT:

Name Surname	
R.T ID No <i>(Nationality, passport number if ID number for foreign nationals)</i>	

Address of Domicile or Office address	
E- mail address Telephone Fax Number For the notification	
Are you still employed by the Company? (Yes/ No)	

2. RELATION TO THE COMPANY:

	I am a business partner	Please indicate your department in the company.
	I am an employee	
	I am a former employee	Please indicate your years of service at the company
	I am an employee of the business partner	Please indicate the name of the company you work for and your position.
	Other	Please indicate your relation to the company and the department you are in contact with.

3. YOUR REQUEST IN TERMS OF PDPL:

(Please tick the box(es) next to the request you wish to place and give more detail on your request related to PDPL.)

Option	Request	Legal basis
	Learn whether or not my personal data have been processed by your company	PDPL a.11/1-a
	Request information as to processing if my data have been processed by your company	PDPL a.11/1-b
	Learn the purpose of processing of the personal data and whether data are used in accordance with their purpose if the company processes personal data	PDPL a.11/1-c

	Please send it to my address above.
	Please send it to my e-mail above.
	I wish to receive it personally. <i>(Certified power of attorney or authorization document is sought if to be delivered to a proxy.)</i>

This application form was prepared in order to determine your relation with our Company and detect your processed personal data (if any) by our company and to respond to your application correctly within legally due time. Our company reserves the right to request additional information and documents (copy of ID or driver's license etc.) to determine ID and authorization to eliminate legal risks to arise from sharing of your personal data illegally or unjustly and especially to secure your personal data. Our company doesn't accept liability arising from incorrect information or unauthorized applications in the event that the information in your application form is not correct or up-to-date or an unauthorized application is made. You shall bear all liability arising from illegal, misleading or erroneous applications.

Applicant (Owner of personal data/Data Subject)

Name-Surname :

Date of application :

Signature :