**YARN DAY TEKSTİL SANAYİ VE TİCARET ANONİM ŞİRKETİ**

**Personal Data Protection and Processing Policy**

**Introduction**

According to Article 20 of the Constitution of the Republic of Turkey, everyone has the right to demand the protection of personal data concerning themselves. This right includes being informed about personal data related to oneself, accessing these data, requesting their correction or deletion, and learning whether they are used in accordance with their intended purposes.

The Personal Data Protection Law No. 6698 (“KVKK”) regulates the protection of fundamental rights and freedoms of individuals in the processing of personal data and stipulates the obligations, procedures, and principles that natural and legal persons processing personal data must follow. The purpose of this Policy, prepared in accordance with these regulations, is to ensure compliance with the obligations stipulated by the KVKK.

This Policy covers the personal data of Employees, Employee Candidates, Customers or Service Recipients, and Potential Customers or Service Recipients. These categories may be revised as necessary.

In the event of a conflict between the KVKK and other relevant legislation and the Company’s Personal Data Protection and Processing Policy, the applicable legislation in force will prevail.

**1. Purpose**

The YARN DAY TEKSTİL SANAYİ VE TİCARET ANONİM ŞİRKETİ (“Company” or “Yarn Day”) Personal Data Protection and Processing Policy (“Policy”) has been prepared to protect the fundamental rights and freedoms of individuals, primarily the privacy of private life, in the processing of personal data and to regulate the obligations, procedures, and principles to be followed by natural and legal persons processing personal data.

This Policy aims to ensure that the Company’s activities are conducted and improved in compliance with the principles stated in the KVKK and to inform personal data owners.

**2. Scope**

The data subjects whose personal data are processed within the scope of this Policy are categorized as follows:

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| **Employee Candidate** | Individuals who have applied for a position at the Company or have made their CV and related information accessible to the Company through any means. |
| **Employee** | Individuals who have an ongoing employment relationship with the Company. |
| **Former Employee** | Former employees whose employment relationship with the Company has ended. |
| **Potential Customer or Service Recipient** | Individuals who may potentially purchase products or services from the Company. |
| **Customer or Service Recipient** | Individuals who purchase products or receive services from the Company. |
| **Third Parties** | Other real persons whose personal data are processed within the scope of this Policy, including but not limited to guarantors, family members, etc., even though they are not specifically defined in the Policy. |

**3. Definitions**

The definitions used in this Policy are provided below:

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| **Explicit Consent** | Consent given on a specific subject, based on information, and expressed freely. |
| **Anonymization** | Making personal data unidentifiable and unrelatable to a specific individual, even when matched with other data. |
| **Personal Health Data** | Any health information related to an identifiable or identified natural person. |
| **Personal Data** | Any information relating to an identified or identifiable natural person. |
| **Processing of Personal Data** | Any operation performed on personal data, such as obtaining, recording, storing, preserving, altering, rearranging, disclosing, transferring, taking over, making available, classifying, or preventing use, through automated or non-automated means as part of a data recording system. |
| **KVKK** | Personal Data Protection Law No. 6698. |
| **Board** | Personal Data Protection Board. |
| **Authority** | Personal Data Protection Authority. |
| **Special Categories of Personal Data** | Data on individuals' race, ethnicity, political opinion, philosophical belief, religion, sect, or other beliefs, attire, association, foundation or union membership, health, sexual life, criminal record, and security measures, as well as biometric and genetic data. |
| **TCK** | Turkish Penal Code No. 5237. |
| **Data Processor** | A natural or legal person who processes personal data on behalf of the data controller based on the authority given by them. |
| **Personal Data Owner** | The natural person whose personal data is processed, referred to as the “data subject” in the KVKK. |
| **Data Subject Application Form** | The form used by personal data owners whose data are processed within the Company to exercise their rights explained in Article 11 of the KVKK. |
| **Data Controller** | The natural or legal person who determines the purposes and means of processing personal data and is responsible for establishing and managing the data recording system. |
| **Data Controllers Registry (VERBİS)** | The registry of data controllers maintained by the Personal Data Protection Authority. |
| **Data Inventory** | The personal data processing inventory prepared by the Company that maps personal data processing activities to business processes, including data categories, purposes of processing, recipient groups, retention periods, international transfers, and security measures. |

**4. General Principles Regarding the Processing of Personal Data**

Pursuant to Article 3 of the Personal Data Protection Law (KVKK), any operation performed on personal data, such as obtaining, recording, storing, preserving, altering, rearranging, disclosing, transferring, taking over, making available, classifying, or preventing use, through automated or non-automated means as part of a data recording system, falls within the scope of data processing.

The following principles must be adhered to when processing personal data:
**a. Compliance with the law and the rule of good faith**
Our Company conducts its personal data processing activities in compliance with the Constitution, the Personal Data Protection Law, and other related legislation, adhering to the principles of legality and good faith.

**b. Accuracy and, where necessary, keeping data up-to-date**
While processing personal data, our Company takes all necessary administrative and technical measures to ensure the accuracy and currency of the personal data.

**c. Processing for specific, explicit, and legitimate purposes**
Before starting the personal data processing activity, our Company determines its legitimate purpose for processing personal data in a clear and precise manner within the framework of disclosure texts.

**d. Being relevant, limited, and proportional to the purpose for which they are processed**
Personal data is processed to the extent necessary to achieve the purposes defined by our Company. Data processing is not carried out with the assumption that the data may be used later.

**e. Being retained for the period stipulated in the relevant legislation or required for the purpose for which they are processed**
Our Company retains personal data only for the duration specified in the relevant legislation or as necessary for the purposes of the data processing activity.

**5. Conditions for Processing Personal Data**

Our Company may process personal data and special categories of personal data with the explicit consent of the data subject or, without explicit consent, in the cases stipulated in Articles 5 and 6 of the KVKK.

**5.1. Processing of Personal Data**

As a general rule, our Company processes personal data based on your explicit consent. However, personal data processing activities are carried out without seeking your explicit consent under the following conditions set forth in Article 5 of the KVKK:
a. The processing is explicitly stipulated by laws.
b. It is necessary to protect the life or physical integrity of the person who cannot express consent due to actual impossibility or whose consent is not legally valid.
c. The processing of personal data is necessary for the establishment or performance of a contract to which the data subject is a party.
d. The processing is necessary for the Company to fulfill its legal obligations.
e. The data has been made public by the data subject.
f. The processing is necessary for the establishment, exercise, or protection of a right.
g. The processing is necessary for the legitimate interests of the Company, provided that it does not harm the fundamental rights and freedoms of the data subject.

**5.2. Processing of Special Categories of Personal Data**

Our Company processes special categories of personal data, which are identified as carrying a risk of discrimination when unlawfully processed, in accordance with the data processing conditions set forth in Article 6 of the KVKK. Additionally, adequate measures determined by the Board must be taken when processing special categories of personal data. It is prohibited to process special categories of personal data without the explicit consent of the data subject. However, in the following cases, special categories of personal data may be processed without the explicit consent of the data subject:
a. The processing is explicitly stipulated by laws.
b. It is necessary to protect the life or physical integrity of the person who cannot express consent due to actual impossibility or whose consent is not legally valid.
c. The processing concerns personal data made public by the data subject in line with their intention to make it public.
d. The processing is necessary for the establishment, exercise, or protection of a right.
e. The processing is necessary for the protection of public health, preventive medicine, medical diagnosis, treatment, and care services, or for the planning, management, and financing of healthcare services by persons or authorized institutions and organizations under an obligation of confidentiality.
f. The processing is necessary for the fulfillment of legal obligations in the fields of employment, occupational health and safety, social security, social services, and social assistance.
g. The processing is necessary for foundations, associations, and other non-profit organizations established for political, philosophical, religious, or trade-union purposes, provided that the data is not disclosed to third parties and the processing is limited to their members, former members, or individuals in regular contact with the organizations.

**6. Ensuring the Security and Confidentiality of Personal Data**

In accordance with Article 12 of the KVKK, our Company takes all necessary technical and administrative measures to ensure an appropriate level of security to prevent unlawful processing and access to personal data and to safeguard personal data.

**6.1. Technical Measures to Ensure Lawful Processing and Prevent Unlawful Access to Personal Data**

Our Company has implemented all necessary technical and technological security measures to protect personal data and safeguard it against potential risks.

Technical measures are taken in line with developments in technology and are regularly updated and renewed. Our systems include antivirus protection and firewalls. Employees are informed that they cannot disclose personal data they have learned to others unlawfully or use it for purposes other than processing and are required to provide the necessary commitments. Employees are also informed about security policies to be followed in the workplace. Systems in line with technological advancements are used to store personal data securely.

**6.2. Measures to be Taken in the Event of Unlawful Disclosure of Personal Data**

If personal data is obtained by others through unlawful means despite necessary security measures, our Company will notify the data subject and the Personal Data Protection Board within 72 hours from the date of learning of the situation. Accordingly, the Data Breach and Notification Procedure and related job descriptions have been established and shared by our Company.

**7. Purposes for Processing and Retention Periods of Personal Data**

**7.1. Purposes for Processing Personal Data**

Personal data is processed within our Company for the following purposes:

* Execution of Employee Candidate / Intern / Student Selection and Placement Processes
* Fulfillment of Employment Contracts and Statutory Obligations for Employees
* Execution of Employee Candidate Application Processes
* Execution of Processes Related to Employee Benefits and Entitlements
* Execution of Training Activities
* Management of Access Authorizations
* Execution of Occupational Health and Safety Activities and Training
* Conducting Activities in Compliance with Legislation
* Execution of Goods / Services Procurement Processes
* Management of Emergency Situations
* Conducting and Auditing Business Operations
* Conducting Communication Activities
* Planning of Human Resources Processes
* Legal Process Follow-up and Management
* Execution of Internal Audit / Investigation / Intelligence Activities
* Execution of Finance and Accounting Processes
* Provision of Information to Authorized Institutions and Organizations
* Conducting Management Activities
* Execution of Goods / Services Sales Processes
* Management of Customer Relations
* Execution of Goods / Services Production and Operational Processes
* Organization and Event Management
* Execution of Contract Processes
* Execution of Logistics Activities
* Conducting Archiving and Recordkeeping Activities
* Receiving and Evaluating Suggestions for the Improvement of Business Processes
* Execution of Business Continuity Activities
* Execution of Firm / Product / Service Loyalty Processes
* Planning of Human Resources Processes
* Tracking Requests / Complaints
* Execution of Product / Service Marketing Processes
* Execution of Compensation Policy
* Execution of Assignment Processes
* Execution of Information Security Processes
* Conducting Audit / Ethics Activities

**7.2. Retention Periods of Personal Data**

Our Company determines whether there is a specified period for retaining personal data in the relevant legislation. If a period is stipulated, our Company complies with it; if no period is stipulated, personal data is retained only for the duration necessary for the purpose for which it is processed.

If the purpose of processing personal data has ceased, and the retention periods stipulated in the relevant legislation and/or by our Company have expired, personal data will only be retained for the purpose of providing evidence in potential legal disputes, exercising a related right, or establishing a defense. Personal data is not stored by our Company for potential future use.

**8. Deletion, Destruction, and Anonymization of Personal Data**

Pursuant to Article 7 of the KVKK, personal data, despite being processed in accordance with the relevant legislation, will be deleted, destroyed, or anonymized by our Company upon request or ex officio when the reasons for processing no longer exist.

The procedures and principles related to this matter will be carried out in accordance with the Regulation on the Deletion, Destruction, or Anonymization of Personal Data, published in the Official Gazette No. 30224 on 28.10.2017.

Personal data will be deleted, destroyed, or anonymized in the first periodic deletion process following the date when our obligation to delete, destroy, or anonymize personal data arises.

The maximum period for deleting, destroying, or anonymizing personal data is six (6) months from the date when our obligation arises.

The interval for conducting periodic deletion is six months.

When you request the deletion or destruction of your personal data by applying to our Company:
a) If all conditions for processing personal data have been eliminated, the personal data subject to the request will be deleted, destroyed, or anonymized. Your request will be concluded within thirty days at the latest, and you will be informed.
b) If the conditions for processing personal data have been eliminated and the personal data subject to the request has been transferred to third parties, this situation will be notified to third parties, and necessary actions will be taken under the Regulation.
**c)** If not all conditions for processing personal data have been eliminated, your request may be rejected by explaining the reason in accordance with Article 13, paragraph 3 of the KVKK, and the rejection response will be communicated to you in writing or electronically within thirty days at the latest.

**8.1. Techniques for Deletion and Destruction of Personal Data**

Deletion of personal data refers to the process of making personal data completely inaccessible and unusable for the relevant users.
Destruction of personal data refers to the process of making personal data completely inaccessible, unrecoverable, and unusable by anyone.
Example: Physical destruction, secure masking from the software, secure deletion by an expert.

**8.2. Techniques for Anonymization of Personal Data**

Anonymization refers to rendering personal data in such a way that it cannot be associated with an identified or identifiable natural person under any circumstances, even when matched with other data.
Examples: Masking, data derivation, pseudonymization, aggregation, data mixing.

**9. Third Parties to Whom Personal Data Is Transferred and Purposes of Transfer**

The procedures and principles to be applied for the transfer of personal data are regulated in Articles 8 and 9 of the KVKK, and personal data and special categories of personal data of the data subject can be transferred to third parties within the country. Our Company may transfer the personal data and special categories of personal data of the data subject to third parties (third-party companies, group companies, third natural persons) by taking necessary security measures in line with lawful data processing purposes. Our Company acts in accordance with the regulations stipulated in Article 8 of the Law.

Even if the explicit consent of the personal data owner is not obtained, personal data may be transferred to third parties by our Company, with due diligence and taking all necessary security measures, including those specified by the Board, if one or more of the following conditions exist:

* The relevant activity related to the transfer of personal data is explicitly stipulated by laws.
* The transfer of personal data is directly related to and necessary for the establishment or performance of a contract.
* The transfer of personal data is mandatory for the Company to fulfill its legal obligations.
* Provided that the personal data has been made public by the data subject, it is transferred by our Company in a limited manner for the purpose of publicizing.
* The transfer of personal data is necessary for the establishment, exercise, or protection of the rights of the Company, the data subject, or third parties.
* The transfer of personal data is mandatory for the legitimate interests of the Company, provided that it does not harm the fundamental rights and freedoms of the data subject.
* It is necessary to protect the life or physical integrity of the person who is unable to express consent due to actual impossibility or whose consent is not legally valid.

Your personal data may be shared with Authorized Public Institutions and Organizations, infrastructure providers of the Company, trainers, third parties providing services, travel agencies, legal entities providing e-archive and e-invoice services, legal entities providing e-archive services, server service providers for our websites, insurance companies, banks/financing companies, debt collection companies, workplace doctors, natural and legal persons with whom we have a power of attorney relationship, in order to fulfill the legal obligations and to carry out the Company's commercial activities, in accordance with the provisions of the law and for the purposes of fulfilling legal obligations.

However, except for the exemptions specified in the KVKK, personal data cannot be transferred without the explicit consent of the personal data owner. Therefore, in cases where there is a data transfer subject to the explicit consent of the personal data owner, personal data will not be transferred to third parties without the explicit consent of the personal data owner and will not be shared in any way.

**9.1. Domestic Transfer of Personal Data**

In accordance with Article 8 of the KVKK, personal data can be transferred domestically, provided that one of the conditions specified in Section 5, “Conditions for Processing Personal Data,” of this Policy is met.

**9.2. Groups to Whom Personal Data Is Transferred by Our Company**

Our Company may transfer personal data of the data subjects, which fall within the scope of this Policy, to the groups listed below for the purposes specified, in compliance with Articles 8 and 9 of the Personal Data Protection Law:

* **Authorized Public Institutions and Organizations:** Personal data can be transferred to relevant public institutions and organizations to fulfill legal obligations.
* **Group Companies:** Personal data can be transferred within the group companies for the purpose of conducting business activities and management processes.
* **Service Providers:** Personal data can be transferred to service providers, including suppliers and third parties providing technical support, for the purpose of carrying out operational and infrastructure-related activities.
* **Business Partners and Affiliates:** Personal data can be transferred to business partners and affiliates for the purpose of ensuring the continuity of business relationships and joint activities.
* **Legally Authorized Third Parties:** Personal data can be shared with third parties who are legally authorized to access the data within the framework of the law.

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| **Person Groups** | **Definition** |
| **Authorized Public Institutions and Organizations** | Authorized public institutions and organizations\*\* that are legally entitled to receive information and documents from our Company in accordance with the provisions of the relevant legislation (e.g., Social Security Institution (SGK), Tax Offices, Ministries, Law Enforcement, Courts, etc.) |
| **Legally Authorized Private Legal Entities** | **Legally authorized private legal entities** that are entitled to receive information and documents from our Company in accordance with the provisions of the relevant legislation (e.g., Audit Firms, Law Firms, Service Providers, etc.) |

**10. Company’s Obligation to Inform**

In accordance with Article 10 of the KVKK, our Company must inform data subjects during the collection of personal data. In this context, our Company fulfills its obligation to inform on the following matters:
a. The name of our Company as the data controller,
b. The purpose of processing personal data,
c. To whom the processed personal data can be transferred and for what purposes,
d. The method and legal basis of personal data collection,
e. The rights of the data subject as outlined in Section 11.1 of this Policy titled “Right to Application.”

**11. Rights of Personal Data Owners and Exercising These Rights**

In accordance with Article 13 of the KVKK, the evaluation of personal data owners' rights and the necessary information are provided through this Policy as well as the Company’s Data Subject Application Form. Personal data owners can submit complaints or requests related to personal data processing activities in accordance with the principles specified in the relevant form.

**11.1. Right to Application**

In accordance with Article 11 of the KVKK, any person whose personal data is processed may submit requests to our Company on the following matters:
a. To learn whether their personal data is being processed or not,
b. To request information if their personal data has been processed,
c. To learn the purpose of processing personal data and whether they are used in accordance with their intended purpose,
d. To learn about the third parties to whom personal data is transferred within the country or abroad,
e. To request correction of personal data if it has been processed incompletely or incorrectly and to request that the third parties to whom the personal data has been transferred be informed of such correction,
f. To request deletion, destruction, or anonymization of personal data if the reasons for processing no longer exist, and to request that the third parties to whom the personal data has been transferred be informed of such deletion,
g. To object to any negative result that is obtained solely through the analysis of processed data by automated systems,
h. To request compensation for damages if they suffer harm due to the unlawful processing of personal data.

**11.2. Cases Outside the Scope of the Right to Application**

Pursuant to Article 28 of the KVKK, personal data owners cannot exercise their rights in the following cases:
a. If personal data is processed by natural persons within the scope of activities related to themselves or their family members living in the same household, provided that personal data is not disclosed to third parties and the obligations regarding data security are complied with.
b. If personal data is processed for purposes such as official statistics or research, planning, and statistics through anonymization.
c. If personal data is processed for artistic, historical, literary, or scientific purposes or within the scope of freedom of expression, provided that such processing does not violate national defense, national security, public security, public order, economic security, privacy of private life, or personal rights, or does not constitute a crime.
d. If personal data is processed within the scope of preventive, protective, and intelligence activities conducted by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order, or economic security.
e. If personal data is processed by judicial authorities or execution agencies concerning investigation, prosecution, judicial, or execution procedures.

Pursuant to Article 28, paragraph 2 of the KVKK, except for the right to request compensation for damages, personal data owners cannot exercise their rights in the following cases:
a. If the processing of personal data is necessary for the prevention of a crime or for a criminal investigation,
b. If the processing of personal data is necessary for the investigation, planning, and execution of a crime,
c. If the processing of personal data is necessary for the execution of a crime,
d. If the processing of personal data is necessary for the execution of a judicial authority's decision,

**11.3. Procedure for Responding to Applications**

In accordance with Article 13 of the KVKK and the Communiqué on the Procedures and Principles of Application to the Data Controller, our Company will conclude the requests made by the personal data owner free of charge as soon as possible and within 30 (thirty) days at the latest, depending on the nature of the request. In accordance with Article 13 of the KVKK, your application must be submitted to our Company in writing or by other means determined by the Board.

The application of the personal data owner may be rejected in the following cases:
a. If it prevents the rights and freedoms of other persons,
b. If it requires disproportionate effort,
c. If the information is public information,
d. If it endangers the privacy of others,
e. If one of the cases outside the scope of the KVKK is present.

This Policy may be revised by the Company as necessary. In case of revision, the most current version of the Policy will be made available in the Company’s shared folders.