

**ALADDIN MIDDLE EAST LIMITED LIABILITY
COMPANY ANKARA TURKEY BRANCH
POLICY FOR PROTECTION, PROCESSING AND
DEMOLITION OF PERSONAL DATA**



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**ALADDIN MIDDLE EAST LIMITED LIABILITY COMPANY ANKARA TURKEY
BRANCH POLICY FOR PROTECTION, PROCESSING AND DEMOLITION OF
PERSONAL DATA**

DOCUMENT INFIRMATION FORM

Document Name	:	Aladdin Middle East Limited Liability Company Ankara Turkey Branch, Policy for Protection, Processing and Demolition of Personal Data
Target Group	:	All natural persons whose personal data are processed by the Aladdin Middle East Limited Liability Company Ankara Turkey Branch
Prepared by	:	Management of the Aladdin Middle East Limited Liability Company Ankara Turkey Branch
Version	:	1.0
Endorsed by	:	Endorsed by the Management of the Aladdin Middle East Limited Liability Company Ankara Turkey Branch.

Aladdin Middle East Limited Liability Company Ankara Turkey Branch 2018

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SECTION ONE
GENERAL PROVISIONS

Article 1 - Purpose

The purpose of the Data Protection, Processing and Data Demolition Policy (“**Policy**”) is to determine the procedures and principles related to the processing and protection of personal data as well as deletion, demolition and anonymization of personal data carried out in compliance with the legal legislation which forms the basis for this Policy by Aladdin Middle East Limited Liability Company- Turkey Ankara Branch (“**AME**”).

Article 2 - Scope

This policy relates to processed personal data that are fully or partially automated or not automated on the condition that they are part of any data recording system, of employees, employee candidates, administrators, visitors working in AME, employees and managers of third parties that we are in cooperation, and other third parties.

In this respect, all of the aforementioned personal data owner groups may apply the whole of this Policy as well as only a few provisions of this Policy.

Article 3 – Basis

This Policy has been prepared on the basis of the Law on the Protection of Personal Data No. 6698, the Regulation on the Data Controllers Registry No. 30286 and the Regulation on the Deletion, Demolition or Anonymization of Personal Data No. 30224.

The relevant regulations in force on the processing, protection and demolition of personal data will be the priority area of application. If there is an incompatibility between the Legislation and the Policy, the AME acknowledges that the applicable legislation precedes.

Article 4 - Definitions

Within the enforcement of this Policy;

- a. Recipient group: refers to the category of natural or legal persons to which personal data is transferred by the data controller.
- b. The relevant user: refers persons who process personal data in the data controller organization or in accordance with the authority and instructions received from the data controller except for the person or unit responsible for the technical storage, protection and back-up of data,
- c. Demolition: refers the deletion, demolition or anonymization of personal data,

- d.** Law: refers Law No. 6698 on the Protection of Personal Data,
- e.** Recording medium: refers any medium where personal data is processed by non-automatic means, in whole or in part, whether automated or as part of any data recording system,
- f.** Personal data: refers to all information about a known or identifiable natural person,
- g.** Personal data owner: refers natural person whose personal data has been processed,
- h.** Processing of personal data: refers any kind of activities on data such as obtaining, recording, storing, maintaining, changing, reorganizing, disclosing, transferring, acquiring, making it accessible, classifying or preventing the use of personal data that are fully or partially automated or not automated on the condition that they are part of any data recording system,
- i.** Personal data processing Inventory: refers to the personal data processing activities carried out by data controllers depending on their business processes, the purpose for processing the personal data, the data category, the transferred recipient group and the maximum amount of time that they set by associating with subject data group and that required for the purpose of processing of personal data, personal data projected to be transferred to foreign countries and the inventory that involves measures taken regarding data security are described and detailed.
- j.** Board: refers to the Board of Protection of Personal Data.
- k.** Institution: refers to the Institution for the Protection of Personal Data.
- l.** Special quality personal data: refers to data relating to persons' race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, costumes and dresses, association, foundation or union membership, health, sexual orientation, criminal conviction and security measures as well as biometric and genetic data.
- m.** Periodic demolition: refers to the process of deleting, demolishing or anonymizing the personal data, which is specified in the policy for storage and demolition of the personal data and which shall be carried out at repeated intervals, if all the processing conditions of the personal data contained in the law are eliminated.
- n.** Policy: refers to this Policy whereby data officers rely on the process of deleting, demolishing and anonymizing the process for determining the maximum time required for the purpose of which the personal data is processed.
- o.** Registry: refers to the registry of data officers held by the Personal Data Protection Agency.
- p.** Data processor: refers to the natural and legal person who processes personal data on his or her behalf based on the authority given by the data controller.
- q.** Data recording system: refers to the recording system in which personal data is structured and processed based on the certain criteria.
- r.** Data controller: refers to the natural or legal person who determines the purpose and means of processing of personal data and who is responsible for the establishment and administration of the data recording system.

For definitions that are not included in this Policy, the definitions in the Law are valid.

SECTION TWO

PRINCIPLES TO BE APPLIED IN AME

Article 5 - The Disclosure and Notification of the Owner of the Personal Data

The AME informs personal data owners during the acquisition of personal data. In this context, AME will explain to the personal data owners for what purpose the personal data shall be processed, for whom and what purpose the personal data processed shall be transferred, what collection method and the legal reason are for the personal data.

There is also a “request for information” among the rights of the personal data owner. AME will provide the necessary information if the personal data owner requests information

AME ensures the informing of those concerned about the personal data processing activities, accountability and transparency by disclosing through various documents that are open to the public, especially with this Policy, to the owners of personal data and others that it operates personal data activities in accordance with the law and the rules of honesty

Article 6 - Protection of the Rights of the Data Owner

AME conducts the necessary channels, internal operations, administrative and technical regulations in accordance with the Law in order personal data owners to assess their rights and to provide necessary information to the personal data owners.

In the event that personal data owners submit their requests for the following rights to AME in writing, AME shall conclude the request free of charge as soon as possible and within thirty (30) days at the latest, based on the nature of the request. If the transaction requires additional costs, the fee determined by the Board will be charged by the AME.

Personal data owners have the right to request for followings;

- To learn if personal data has been processed,
- To request personal information if personal data has been processed,
- a. To learn the purpose of processing of personal data and if personal data are used appropriate to its purpose,
- To know the third parties in which personal data is transferred at home or abroad,
- To request correction of personal data if it is incomplete or incorrect processing and request that the transaction to be notified to third parties in which the personal data was transferred,
- To request the deletion or demolition of personal data if the reasons for the processing of the data are eliminated, although it has been processed in accordance with the

provisions of the law and other relevant legislation, and request that the transaction be notified to the third parties in which the personal data was transferred,

- To object to the drawing a conclusion against the person himself/herself by analyzing the processed data exclusively through automated systems,
- To demand compensation in case of incurrance of damage due to the illegal processing of personal data.

When using the rights mentioned above, the data holders must submit their requests to the AME in “writing” or by the methods determined by the Law.

If the data owners request to use the rights mentioned above, they can send their written requests in wet signed form to our Company’s Karum İş Merkezi Iran Caddesi No: 21/394 Kavaklıdere Çankaya / Ankara address by hand or through the notary public documents.

Data owners will receive responses to such application promptly and effectively, if they submit written requests as well as necessary identifying information to AME when completing their application. If the data owners request to exercise the above-mentioned rights, they can submit their written requests in a wet signed form with the documents that will authenticate the identity of the data owner to our company's Karum Business Center Iran Caddesi No:21/394 Kavaklıdere Çankaya/Ankara address in person or through notary public.

Article 7 - The Recording Environment in Which Personal Data is Stored and Destroyed

Any medium that is involving processed personal data acquired by AME automated or not automated, either fully or partially, on the condition that they are part of any data recording system, is considered to be a recording medium. All personal data within AME is kept and stored in the following systems in a maximum secure manner.

Personal data of data owners are securely stored in the environments listed in the table below by AME in line with the data security principles in accordance with the relevant legislation particularly with the provisions of Law:

- Electronic environments:

- Micro
- Linux
- Ms Office Programs

- Physical environments:

- Unit Cabinets
- Archive Cabinets

Article 8 - Ensuring the Security of Personal Data

AME takes the necessary legal, technical and administrative measures on data security and shows utmost importance and care in this regard.

AME personnel have been informed that they would not be able to disclose the personal data they learned to others in violation of the provisions of the law, could not use such data for any other purposes other than processing it, and that these obligations would continue in case they left the AME.

AME conducts and have it conducted all necessary inspections within its own organization. When it is determined that the measures taken as a result of the audit should need to be improved, necessary actions are taken by AME instantly.

In the event that personal data is learned and/or obtained by others through unlawful means despite all the general, technical and administrative measures mentioned below, AME will fulfill its obligation to inform the data owner and the board as soon as possible.

Article 9 - The General Measures to be Taken for the Safe Storage of Personal Data and for the Prevention of Unlawful Processing and Accessing

Personal data are processed by AME only in accordance with the procedures and principles stipulated in the law and other legal regulations. AME respects the following principles when processing personal data:

a. Compliance with Law and Good Faith

AME acts in accordance with the principles brought with the relevant legislation and good faith in the processing of personal data. AME does not use personal data outside of the measure required for the fulfillment of the relevant purpose by taking into account the proportionate requirements for processing personal data.

b. Being Correct And Updated When Needed

AME takes into account the fundamental rights and interests of personal data owners and ensures that the personal data it processes is accurate and up to date. In line with this aim, AME takes the necessary measures.

c. Processing for Specific, Explicit and Legitimate Purposes

AME clearly and explicitly determines the purpose of processing personal data which are legitimate and lawful. AME processes personal data in connection with the service that it provides and to the extent required by that service. AME reveals the purpose for which personal data will be processed prior to the process of personal data is initiated

d. Being Associable, Limited and Measured with the Purpose of Processing

AME processes personal data in a manner that is conducive to the fulfillment of the specified purposes. In this context, it avoids the processing of personal data that is not related to or needed for the fulfillment of the purpose for processing personal data..

e. Preservation for the Period Required in the Relevant Legislation or Required for the Intended Purpose

AME preserves personal data for the period required for the purpose specified in the relevant legislation or for the purpose for which they were processed. In this context, the AME first acts in accordance with the relevant legislation in order to determine how long the personal data should be kept, and, if not stated, it keeps it as long as it is required to be processed. In the event that the period expires or the reason required for processing eliminates, personal data is deleted, demolished or anonymized by the AME.

Article 10 - Technical and Administrative Measures to be Taken for the Safe Storage of Personal Data and for the Prevention of Unlawful Processing and Access

AME in order to;

To prevent unlawful processing of personal data,

To prevent unlawful access to personal data,

To ensure the preservation of personal data,

knows that it has to take all necessary technical and administrative measures in an attempt to enable the appropriate level of security and it shows maximum care and importance within this framework.

AME recognizes that if the personal data it possesses is processed by another natural or legal person, it will be jointly responsible along with those persons for taking the above mentioned measures together.

As a matter of fact, AME is aware that it has to conduct and have it conducted all necessary audits in order to ensure the implementation of the provisions of law and related legislation, and it executes necessary procedures for this aim and performs internal trainings, independent audits and gets consultancy services.

Article 11 - Titles, Units, Job Descriptions of Responsible Persons Partaking in the Name of AME in the Process of Storing and Demolishing of the Personal Data

The title, units and job descriptions of the personnel involved in the process of personal data storage and demolition can be found in the list in Annex-1 of this Policy. The persons concerned shall perform all their obligations fully in the storage and destruction processes of the personal data set out in this Policy.

**SECTION THREE
PRINCIPLES FOR PROCESSING PERSONAL DATA**

Article 12 - Conditions for Processing Personal Data

In order for personal data to be processed, the consent of the person concerned is required. Explicit consent is only one of the legal grounds for processing personal data. In addition to the explicit consent, the personal data may also be processed in the event of one or more of the following situations occur. The AME may only process personal data without having the explicit consent of the person concerned, if any of the following conditions exist.

a. Explicit Consent

The explicit consent of the owner of personal data should be disclosed on a specific issue, based on information and free will. In this context, AME shall obtain explicit consent of the personal data owner for the processing of its personal data.

b. Clearly Prescribing in the Law

The personal data of the owner of the data may be processed in accordance with the law by the AME if explicitly stipulated in the law.

c. Failure to Obtain the Explicit Consent of the Person Concerned due to Actual Impossibility

Personal data of the data owner can be processed if the person who cannot explain his/her consent due to de facto impossibility or if it is obligatory to protect the life or body integrity of himself/herself or someone else who is not legally validated by his consent.

d. Being Directly Related with the Formation or Enforcement of the Contract

Personal data may be processed if it is necessary to process the personal data belonging to the parties to the contract, provided that it is directly related to the formation or enforcement of a contract.

e. AME's Fulfillment of its Legal Obligation

If data processing is mandatory for AME to fulfill its legal obligation, the data owner's data can be processed.

f. Making Publicize of Personal Data by the Personal Data Owner

Personal data may be processed in the event that the data owner has publicly revealed the personal data.

g. Making the Data Processing Mandatory for the Establishment or Protection of a Right

Where it is necessary to process data for the establishment, use or protection of a right, the data owner's personal data may be processed.

h. Making Data Processing Mandatory for the Legitimate Interest of the AME

AME may process personal data if it is necessary to process data for the legitimate interests of AME, provided that it does not damage the fundamental rights and freedoms of the personal data owner.

Article 13 - Processing Conditions of Special Quality Personal Data

AME knows that private personal data will not be processed without the express consent of its owners. Personal data other than health and sexual life may be processed without seeking the explicit consent of the person concerned in cases stipulated by law. Personal data relating to health and sexual life may only be processed by persons or authorized organizations and institutions that are under confidentiality obligation for the purposes of protecting public health, conducting preventive medicine, medical diagnosis, treatment and maintenance services, planning and management of health services and financing, without the explicit consent of the concerned.

AME does not process private personal data in respect of its field of activity. However, if it is necessary to process special data in exceptional circumstances, it may process special personal data as described in this article, in accordance with the Law and also by taking the necessary measures determined by the Board.

Article 14 - Transfer of Personal Data

No personal data is transferred abroad by AME.

AME, in order to ensure the legal and commercial security of the persons involved in business relationship with AME (Administrative operations for communication carried out by our company, to ensure the physical safety and control of the company's locations, assessment processes of business partner, customer, supplier, officials or employees, reputation research processes, legal compliance process, audit, execution of financial affairs), for the aims of determination and implementation of business and commercial strategies of our company as well as the execution of human resources policies, AME may transfer the data to the AME authorities, shareholders, public authorities and private individuals authorized by law within the framework of the personal data processing requirements and purposes set out in Articles 8 and 9 of the Law

Article 15- Personal Data Processing Activities in the Workplace and Workplace Entrances as well as Website Visitors

In order to ensure safety by AME, personal data processing activities are carried out for monitoring with surveillance cameras in the central office of AME, in drilling and oil fields and for monitoring guest inputs and outputs. Personal data processing is carried out by AME through the use of security cameras and recording of guest input and output. AME acts in compliance with the law and all other legislation, particularly the Constitution, when processing data in this way.

AME carries out monitoring activities with security camera in the workplace to ensure the safety of AME, its employees, visitors and other persons and to ensure the safety of oil and drilling fields and the technical personnel working there.

Only a limited number of AME employees have access to records stored in the AME digitally and kept it for one week in the field and one month in the head office. Live camera images can be monitored by the Information Technology Manager and security chief. A confidentiality commitment shall be made between the limited number of employees who have access to records and the AME.

Except for the camera recording described above, no other personal data is recorded for the people who come to the offices of AME as guests.

SECTION FOUR

PRINCIPLES REGARDING THE DELETION, DEMOLITION OR ANONYMIZATION OF PERSONAL DATA

Article-16 Principles Regarding the Deletion, Demolition or Anonymization of Personal Data

AME fulfills its obligation for deleting, demolishing or anonymizing the personal data on its own or at the request of the person concerned, in cases where all of the terms regarding all conditions for the processing of personal data which are specified in Article 12 and Article 13 are eliminated.

AME acts in conformity with the general principles and technical and administrative measures as specified in Article 9 and Article 10 of this Policy, as well as the relevant legislative provisions and the decisions of the Board in the deletion, demolition or anonymization of personal data.

All transactions related to the deletion, demolition and anonymization of personal data are recorded by the AME and the records are kept for at least three years, with the exception of other legal obligations.

AME chooses the appropriate method for deletion, demolition or anonymization of personal data, unless otherwise agreed by the Board. Upon request of the person concerned, AME chooses the appropriate method by explaining the justification

Article 17 - Deletion of Personal Data

Deleting personal data is the process of making personal data inaccessible and unusable by no manner or means for respective users. AME takes all necessary technical and administrative measures to ensure that deleted personal data cannot be accessed and used again for the relevant users.

Article 18 - Demolition of Personal Data

The demolition of personal data is the process of making personal data inaccessible, irreplaceable and unusable by no manner or means for anyone. AME takes all necessary technical and administrative measures regarding the demolition of personal data.

Article 19 - Anonymization of Personal Data

Anonymization of personal data means that personal data cannot be linked to a specific or identifiable real person in any way, even if it is mapped to other data. In order to make personal data anonymous, personal data must be made inaccessible to a specific or identifiable person, even through the use of appropriate techniques, such as the registration environment and the matching of the data with other data, by the data commissioner, recipient or groups of recipients.

AME takes all necessary technical and administrative measures to make personal data anonymous.

The anonymization of personal data means that personal data cannot be associated with a specific or identifiable person, even if the appropriate techniques are used in relation to the recording environment and the relevant field of activity, such as the return of personal data by the data controller, recipient or recipient groups, and the matching of the data with other data.

AME takes all necessary technical and administrative measures to make personal data anonymous.

Article 20 - Methods to be Applied for the Deletion, Demolition and Anonymization of Personal Data

AME shall delete, demolish and/or anonymize the personal data available in its organization by using the methods described below.

a. As Service Application Type Cloud Solutions

AME will delete the data in the cloud system by issuing a delete command. When performing the aforementioned transaction, it shall be paid particular attention to the fact that the user does not have the authority to retrieve the deleted data on the cloud system.

b. Personal Data Available in Paper Based

AME will delete personal data contained in the paper environment using the blackout method. The blackout process is carried out in the form of removing the personal data from the related document when possible, making it invisible to the users using indelible ink in such manner that it shall not be reversed and read by technological solutions in cases where it is not possible. Additionally, AME will be able to destroy the personal data available in the paper media by using the shredder machine and making the personal data unreadable.

c. Office Files Available in the Central Server

The file must be deleted with the delete command on the operating system, or the user's access rights must be disentitled from the file or directory on which the file exists. When performing the aforementioned operation, AME will pay attention that the relevant user is not also a system administrator.

d. Personal Data on Portable Media

AME stores personal data in flash based storage media in encrypted form and will delete it using appropriate software.

e. Data Bases

AME shall delete the related rows where the personal data is stored with the database commands. When performing the mentioned transaction, AME shall pay attention that the relevant user is not also a database administrator.

Article 21 – Durations for Ex Officio Deletion, Demolition or Anonymization of Personal Data

AME will delete, demolish or anonymize the personal data in the first periodic demolition process following the date of its obligation to delete, demolish or anonymize the personal data.

The periodical demolition shall be carried out by AME within thirty (30) days time period following the date on which the obligation of periodical deletion, demolition or anonymization of personal data is due. In case of necessity, this period can be extended thirty (30) days at most.

AME agrees that in the event of incurrance of irrecoverable or irreparable damages, and in the case of explicit breach of the law, the board may shorten the periods set out in this article.

Article 22 - Requests for the Deletion and Demolition of the Personal Data of the Data Owner

The data owner submits the requests related to the implementation of the Law to AME in writing or in other ways determined by the Board.

AME shall conclude the requests in the application free of charge as soon as possible and within thirty (30) days at the latest based on the nature of the request. However, if the transaction requires an additional cost, the fee in the tariff determined by the Board may be taken as basis.

AME accepts the request or declines it by explaining the reasons and informs the person concerned in writing or electronically. If the demand in the application is accepted, the necessary action is taken by AME. If the application is originated from AME's fault, the fee will be refunded to the concerned person.

Article 23 - Durations of Deletion and Demolition of Personal Data If Requested by the Data Owner

In case the data owner requests the deletion or demolition of his personal data by applying to AME in accordance with Article 22 of this policy;

a. Non-Existence of All Terms for Personal Data Processing

AME request deletes, demolishes or anonymizes personal data subject to application. AME finalizes the relevant person's request within thirty (30) days at the latest and notifies the person concerned.

b. Non-Existence of all Terms of Personal Data Processing and Transfer of Personal Data subject to Request to Third Parties

AME reports this situation to the third party; it ensures that necessary actions are taken within the scope of the Regulation on the Deletion, Demolition or Anonymization of Personal Data by the third party.

c. Non-Disappearance of all Terms of Personal Data Processing

This request may be rejected by AME pursuant to the article 22/3 of this Policy and the response of reject shall be notified to the data owner in writing or electronically no later than thirty (30) days at latest.

SECTION FIVE **OTHER PROVISIONS**

Article 24 – Independent Audit Activities Implemented within AME Carried Out within the Framework of Compliance with the Law and the Decisions of the Board

As AME is extremely sensitive to the processing, preservation and demolition of personal data pursuant to the law and the board decisions, it outsources in company training and consultancy services from an independent law firm working in the field of “Personal Data Protection Law” once a year in order to ensure that data security is implemented and that the new board decisions are put in to practice within the company and that the changes in the legislation are followed continuously. As a result, AME always keeps itself up to date on all relevant legislation, especially laws and board decisions.

APPENDIX-1

TABLE FOR STORING AND DISPOSING OF PERSONAL DATA

PROCESS	STORAGE PERIOD
Personnel private health and personal accident insurance policies	1 year
Allocation of vehicles to employees	1 year
Registration / Tracking Systems	1 year
General Assembly Activities	10 year
Vehicle registration / paperwork preparation processes	10 year
Accident Reporting	10 year
Sharing meeting notes with participants	10 year
Filing all kinds of documents	10 year

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Filing training records	10 year
Contracts with third parties	10 year
Information about the company's shareholders and members of the board of directors	10 year
Replying of court / execution information requests related to personnel	10 years from the end of the business relationship
Recruitment	10 years from the end of the business relationship
Payroll Activities	10 years from the end of the business relationship
Occupational health and safety practices	10 years from the end of the business relationship
Payment procedures	10 years from the end of the business relationship
Personnel Financial Procedures	10 years from the end of the business relationship
Retention of the part of the contract process and the contract	10 years from the end of the business relationship

APPENDIX - 2

POLICY UPDATE TABLE

Aladdin Middle East Limited Liability Company - Ankara Turkey Branch
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Amendments made in this Policy are listed in the Table below.

DATE OF UPDATE	DATE OF ENFORCEMENT	SCOPE OF AMENDMENTS
		<i>No updates have been made yet.</i>