



LESAFFRE

PERSONAL DATA PROCESSING, STORING, AND DELETION
POLICY

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1. Personal Data Policy's Purpose, Scope, and Effectiveness

Our company, LESAFFRE TURQUİE MAYACILIK ÜRETİM VE TİCARET A.Ş. ("Company"), is very sensitive to protect personal data and carries out necessary works to comply with legislation provisions of the Law on Personal Data Protection ("Law") entered into force on April 7th, 2016.

This Personal Data Processing, Storing, and Deletion Policy ("Policy") prepared under these works is prepared to determine the rules and procedures on processing, storing, and deletion of personal data and/or specially qualified personal data ("Personal Data" together) of real persons that have relation with Company that has the title of *<data controller>* and covers persons specified at Article 3.1.

This Policy's content entered into force on 06.12.2019. If amendments and updates are made to this policy text, you will see information about the amended issues under the relevant heading at the end of the Policy.

2. Procedure on Personal Data Processing

The Company acquires and processes the data subjects' data in accordance with the principles specified in Article 20 of the Constitution of Turkish Republic and Articles 5 and 6 of the Law. The general principles that our company complies with during the data processing procedure are listed below.

2.1. General Principles on Personal Data Processing

a. *Processing in accordance with Law and Integrity Rule*

Company acts in accordance with the principles of legal regulations and general trust and honesty rules in the processing of Personal Data. Within this framework, our Company takes into account the proportionality requirements in the processing of Personal Data and does not use personal data for purposes other than those stated in the Article 3.2. of the Personal Data Policy.

b. *Ensuring Accuracy and Currency, if needed, of Personal Data*

Our Company carries out the necessary examination to ensure the accuracy and currency of the Personal Data received from the data owners.

c. *Processing for Specific, Clear, and Legitimate Aims*

In order to determine the processing of Personal Data for legitimate and lawful aims, our Company specifies the processing purposes of the data clearly and loudly. The said aims of

processing are clearly specified at the Article 3.2 of this Policy based on each data owner and data category.

d. Relevant, Limited, and Measured for Processing Aim

Our company ensures that the data is processed to the extent to realize the data processing aim and takes the necessary administrative and technical measures to ensure that the relevant data is not used for purposes other than its aim.

e. Storing of Data for Required Period as Specified in the Law or the Aim for Which It Was Processed

The Personal Data retained by our Company will be processed for the period necessary for the fulfillment of the purpose for which it was processed and will then be stored for a reasonable period of time or as ordered by legal provisions. When the relevant period is over, the Personal Data will be deleted, destructed or anonymized as specified by this Policy in accordance with the relevant provisions of the Regulation on Personal Data Deletion, Destruction, and Anonymization.

2.2. Processing of Data within Exemption as specified by the Personal Data Law

The rule of acquiring explicit consent from the data owner that is the fundamental condition to process the Personal Data in accordance with the 1st paragraph of Article 5th of the Law is not mandatory if the exemptions set out in the 2nd paragraph of the same article are applied. Explanations on other conditions that legitimate the data processing other than the explicit consent of the data owner are below. It should be noted that all data that is stored and processed by our Company is processed in accordance with the fundamental rules in the application of data processing set out in the Article 4 of the Law.

a. Clear Projection in Law

In the event that the relevant regulations stipulate the processing of relevant data, it is possible to process the data without the explicit consent of the data owner.

For Example: In order to use the management powers, the organization of certificate of incumbency and use of this certificate after processing data of the company managers.

b. Inability to Get Explicit Consent of Data Owner Due to Bodily Incapable

Personal Data of persons whose explicit consent cannot be acquired due to impossibility or whose consent may not be legally valid may be processed in case of the best interest such as protecting the integrity of the person's or third parties' body.

For example: Deterioration of health of person that visit the company and as a result learning of the visitor's personal identity information and notifying this to a health institution.

c. Establishment of Contract or Performance of Contractual Obligations

If the performance of the contractual obligations makes it necessary to process the Personal Data, the data may be processed.

For example: Registration of name, telephone, and fax information of real person agent in order to contact.

d. Fulfillment of Legal Obligation by Company

If it is mandatory to process the relevant data in accordance with the legislation in order for the company to fulfill its legal obligations, the Personal Data of the data owner may be processed without consent.

For example: In order for the company to pay salary to the employee, the company records the employee's bank account number, whether the employee is married or not, and his/her SGK number.

e. Publicizing of Personal Data by Data Owner

The Company can process public information of data owner.

For example: Person shares one's personal information via social media.

f. Mandatory Personal Data Processing to Establish, Use, and Protect a Right

If it is necessary to process data for the establishment, use or protection of a right, the Personal Data of the data owner may be processed.

For example: In the course of the proceedings launched by the Company personnel with various allegations, the Company will present the information including the Personal Data of the personnel to the judicial authorities as evidence.

g. Mandatory Data Processing for Legitimate Benefits

On the ground that the data owner's basic right and freedom are not damaged, the Company may process data in cases where the processing of data is mandatory for the company's legitimate benefits.

For example: In order to ensure food safety in the factories, the health information of the visitors to be present in the production areas is obtained.

3. Company's Data Processing Activities

The Company seeks the data owner's explicit consent in processing Personal Data in accordance with the 1st paragraph of Article 5th of the Law or realization of conditions set out in the 2nd paragraph of the same article and specified Article 2.2 of this Policy.

3.1. Processing Aims of Personal Data on Category Basis

The Company explains the processing aim depending on Personal Data category as follows:

Data Category	Purpose
Identity Information	Employee Candidates' Application Processes Worker Satisfaction and Engagement Processes Fulfillment of Obligations Arising From Employee Contracts and Legislation Conducting Benefits and Side Benefits Processes for Employees Audit / Conducting Ethic Activities Guarantee of Other-Goods Service Sales Conducting Training Activities Execution of Access Powers Conducting of Finance and Accounting Operations Conducting Engagement Process to Firm/Goods/Services Ensuring Physical Space Security Conducting Communication Activities Planning Human Resources Process Conducting/Auditing Work Activities Conducting Occupational Health/Safety Activities Conducting Logistic Activities Conducting Goods/Service Purchase Processes Conducting Goods/Service Sale Processes Conducting Goods/Service Production and Operation Process Organization and Event Management Conducting Marketing Analysis Works Conducting Ad/Campaing/Promotion Processes Social Responsibility and Civil Society Activities Contract Processes Request / Complaints Tracking Wages Policy Goods/Service Marketing Processes Providing Information to Authorized Person, Institution and Oranizaton Management Activities Creation of Visitors Record and Tracking
Communication Information	Employee Candidates' Application Processes Fulfillment of Obligations Arising From Employee Contracts and Legislation Audit / Conducting Ethic Activities Conducting Training Activities Execution of Access Powers Conducting of Finance and Accounting Operations Conducting Engagement Process to Firm/Goods/Services Ensuring Physical Space Security Conducting Communication Activities

	<p>Conducting/Auditing Work Activities Conducting Logistic Activities Conducting Goods/Service Purchase Processes Conducting Goods/Service Sale Processes Conducting Goods/Service Production and Operation Process Conducting of Customer Relations Management Process Conducting Marketing Analysis Works Conducting Ad/Campaing/Promotion Processes Social Responsibility and Civil Society Activities Contract Processes Request / Complaints Tracking Goods/Service Marketing Processes Investment Processes Providing Information to Authorized Person, Institution and Oranizaton Creation of Visitors Record and Tracking</p>
Location Information	Conducting/Auditing Work Activities
Personal Information	<p>Employee Candidates' Application Processes Worker Satisfaction and Engagement Processes Fulfillment of Obligations Arising From Employee Contracts and Legislation Conducting Benefits and Side Benefits Processes for Employees Audit / Ethics Activities Other- In-Company Briefing Execution of Access Powers Performance Evaluation Processes Wages Policy</p>
Customer Operation Information	<p>Guarantee of Other-Goods Service Sales Conducting/Auditing Work Activities Conducting Ad/Campaing/Promotion Processes</p>
Physical Location Security Information	<p>Conducting Benefits and Side Benefits Processes for Employees Ensuring Physical Space Security Creation of Visitors Record and Tracking</p>
Operation Security Information	<p>Employee Candidates' Application Processes Fulfillment of Obligations Arising From Employee Contracts and Legislation Guarantee of Other-Goods Service Sales Ensuring Physical Space Security Conducting of Finance and Accounting Operations Conducting Engagement Process to Firm/Goods/Services Ensuring Physical Space Security Conducting/Auditing Work Activities Conducting Occupational Health/Safety Activities Conducting Goods/Service Purchase Processes Marketing Analysis Works Goods/Service Marketing Processes</p>

	Providing Information to Authorized Person, Institution and Organization Execution of Management Activities
Finance Information	Fulfillment of Obligations Arising From Employee Contracts and Legislation Conducting of Finance and Accounting Operations Conducting Engagement Process to Firm/Goods/Services Conducting Goods/Service Purchase Processes Conducting Goods/Service Sale Processes
Occupational Experience Information	Employee Candidates' Application Processes Fulfillment of Obligations Arising From Employee Contracts and Legislation Other – In-Company Briefing Conducting Training Activities
Marketing Information	Conducting Engagement Process to Firm/Goods/Services Conducting Marketing Analysis Works Conducting Ad/Campaign/Promotion Process Request / Complaints Tracking Conducting Marketing Processes of Goods / Services
Visual and Audio Records	Fulfillment of Obligations Arising From Employee Contracts and Legislation Ensuring Physical Space Security Request / Complaints Tracking Conducting Marketing Processes of Goods / Services Providing Information to Authorized Person, Institution and Organization
Philosophy, Belief, Religion, Sect, and Other Beliefs	Fulfillment of Obligations Arising From Employee Contracts and Legislation Providing Information to Authorized Person, Institution and Organization
Health Information	Fulfillment of Obligations Arising From Employee Contracts and Legislation Conducting Occupational Health/Safety Activities Providing Information to Authorized Person, Institution and Organization Request / Complaints Tracking
Criminal Conviction and Security Measures	Employee Candidates' Application Processes Fulfillment of Obligations Arising From Employee Contracts and Legislation Providing Information to Authorized Person, Institution and Organization
Other Information-Shareholding Information	Conducting Goods/Service Purchase Processes Execution of Management Activities
Other Information-Physical Information	Conducting Occupational Health/Safety Activities

3.2. Data Subjects Whose Data Are Processed

Natural persons whose data are processed by our Company can be divided into various categories, as specified below:

- a. **Employee/Employee Candidate:** Those employed at our Company, or those who may be potentially employed at our company.
- b. **Dealer and/or Dealer's Contact Person:** Sole traders, who are in a dealership relationship with our Company and their employees who are in contact with our Company, or employees of our legal person dealers who are in contact with our Company.
- c. **Client and/or Client's Contact Person:** Sole traders who purchase products directly from our Company and their employees who are in contact with our Company, or employees of legal persons which purchase products directly from our Company, who are in contract with our Company.
- d. **Supplier and/or Supplier's Contact Person:** Sole traders who provide goods or services to our Company and their employees who are in contact with our Company, or employees of our legal person suppliers, which provide goods or services to our Company, who are in contact with our Company.
- e. **Members of the Let the Baker Win:** Natural person bakers, who are members of our Company's 'Let the Baker Win' mobile app
- f. **Accessors:** Natural persons who contact our Company via our Company's Free Call Center, Baking Center Technical Support, Hotline, or contact and campaign forms, which may be reached at our websites and Let the Baker Win mobile app, or social media accounts, and who access our Company's websites.
- g. **Visitors:** Persons visiting our factory and workplaces due to various reasons
- h. **Other persons:** Sub-employer employees, bakers, instructors visiting our Company to give various trainings to our Company employees, those participating the training given at the Baking Center unit, natural person partners of our Company, and our Board of Directors members

3.3. Categories of Processed Data, and Data Processing Purposes

Detailed information on which Personal Data of the Personal Data subjects falling within the scope of the categories mentioned above, are processed by our Company, pursuant to which legal reason and for which purpose, and on the reasons of their transmission to persons

located in Turkey and abroad, are specified below, within the scope of our <clarification liability> as set forth within the Law.

a. Employee / Employee Candidate

Personal Data Processed	Processing Purpose	Legal Reason	Whether it is Transferred in Turkey/abroad, and the Reason of Transfer
<ul style="list-style-type: none"> ❖ Identity Information (name-surname, date of birth, sex, driver's license) ❖ Contact Information (mobile phone, e-mail address) ❖ Employee Candidate Information (education, job experiences, certificates, foreign language) ❖ Citizen Information (military status) ❖ Data Security Information (signature) ❖ Sensitive Personal Data(health information, criminal record) 	<ul style="list-style-type: none"> ❖ To evaluate the employee candidate ❖ To make a job offer to the employee candidate 	<ul style="list-style-type: none"> ❖ Legitimate interest ❖ Explicit Consent 	-
<ul style="list-style-type: none"> ❖ Identity Information (name-surname, T.R. ID No., date of birth, sex, nationality, mother's and father's name, place of birth, birth record information, previous surname, ID card serial no.) ❖ Contact Information (address, phone number, e-mail) ❖ Employee Operation Information (driver's license, education, job 	<ul style="list-style-type: none"> ❖ To keep employee's personnel record and to conduct payroll transactions 	<ul style="list-style-type: none"> ❖ To conclude and perform the contract ❖ Fulfillment of Legal Obligation ❖ Open consent 	<ul style="list-style-type: none"> ❖ Business Associates – to receive consultancy service with regard to calculations concerning legal liabilities and to legal disputes ❖ Bank – to carry out the salary payment ❖ Government Agency – to fulfill legal liabilities

<p>experiences, computer information, certificates, foreign language)</p> <ul style="list-style-type: none"> ❖ Personnel Information (diploma, certificate of employment issued by the previous workplace, service scheme) ❖ Family Members and Relations Information (civil status) ❖ Employee Operation Information (entrance and exit log records, annual leave rights) ❖ Sensitive Personal Data (health information, criminal record, religion information, blood type) ❖ Financial Information (bank information, bank account number, salary) ❖ Family Members and Relations Information (marriage certificate information) ❖ Visual - Audio Information(photo) ❖ Citizen Information (military status) ❖ Data Security Information(signature) 			
<ul style="list-style-type: none"> ❖ Contact Information (mobile phone, e-mail address) 	<ul style="list-style-type: none"> ❖ To establish contact with the employee 	<ul style="list-style-type: none"> ❖ To conclude and perform the contract 	-
<ul style="list-style-type: none"> ❖ Employee Operation Information (physical information) ❖ Sensitive Personal Data(blood type) 	<ul style="list-style-type: none"> ❖ To provide the work uniforms of the factory employee 	<ul style="list-style-type: none"> ❖ To conclude and perform the contract ❖ Explicit consent 	❖ Supplier – Uniform supply
<ul style="list-style-type: none"> ❖ Family Members and Relations Information (marriage certificate information, birth record 	<ul style="list-style-type: none"> ❖ To keep records of the employee's family members 	<ul style="list-style-type: none"> ❖ Explicit consent 	-

information of the family members, photo, student certificates)			
❖ Identity Information (name-surname, birthday, death of close family members, marriage, birth of children) ❖ Employee Information (trainings, job experiences)	❖ Intercompany information provision ❖ Intercompany celebration	❖ Explicit consent	-
❖ Employee Operation Information (trainings received)	❖ To provide the in-service training of the employee	❖ To conclude and perform the contract	❖ Business Associates – to receive consultancy service in legal disputes
❖ Employee Operation Information (work performance)	❖ To evaluate the work performance of the employee	❖ To conclude and perform the contract	❖ Business Associates – to receive consultancy service in legal disputes
❖ Location Information (vehicle tracking)	❖ To audit the company's sales department members, who work in the field	❖ Explicit consent	❖ Business Associates – to receive consultancy service in legal disputes
❖ Physical Space Security Information (camera recordings, entrance and exit log records)	❖ To ensure workplace security, to monitor the environment	❖ Legitimate interest	❖ Business Associates – to receive consultancy service in legal disputes
❖ Visual - Audio Information(photo, video)	❖ To broadcast in social media for advertisement and marketing purposes	❖ Explicit consent	❖ Business Associates – To carry out the shooting

<ul style="list-style-type: none"> ❖ Identity Information (name-surname) ❖ Contact Information (phone number) 	<ul style="list-style-type: none"> ❖ To use in social media targeting in order to notify the employee of products and campaigns 	<ul style="list-style-type: none"> ❖ Explicit consent 	<ul style="list-style-type: none"> ❖ Business Associates – To conduct the targeting process
<ul style="list-style-type: none"> ❖ Identity Information (name-surname, T.R. ID No., mother's and father's name, place of birth, date of birth, civil status, birth record information, previous surname, ID card serial no.) ❖ Visual - Audio Information(photo) ❖ Data Security Information(signature) ❖ Sensitive Personal Data(religion information, blood type) 	<ul style="list-style-type: none"> ❖ To share the company's list of authorized signatures with those demanding it 	<ul style="list-style-type: none"> ❖ Legitimate interest 	<ul style="list-style-type: none"> ❖ Business Associates, Clients Dealers Government Agencies, Other third parties – To issue the company's list of authorized signatures and to share the same upon demand
<ul style="list-style-type: none"> ❖ Identity Information (name-surname) ❖ Contact Information (e-mail address) 	<ul style="list-style-type: none"> ❖ Membership of Food Safety association 	<ul style="list-style-type: none"> ❖ To conclude and perform the contract 	<ul style="list-style-type: none"> ❖ Association – To perform the registration procedures
<ul style="list-style-type: none"> ❖ Identity Information (name-surname, T.R. ID No., mother's and father's name, place of birth, date of birth, civil status, birth record information, previous surname, ID card serial no.) ❖ Visual - Audio Information(photo) ❖ Data Security Information(signature) ❖ Sensitive Personal Data(religion information, blood type) 	<ul style="list-style-type: none"> ❖ To conduct customs operations ❖ To conclude customs recognizance ❖ To share company's list of authorized signatures with those demanding the same 	<ul style="list-style-type: none"> ❖ Legitimate interest 	<ul style="list-style-type: none"> ❖ Business Associates, Suppliers, Banks Competent Institutions – To conduct customs operations

❖ Identity Information (name-surname)	❖ Registration to eBA system	❖ To conclude and perform the contract	-
❖ Identity Information (name-surname) ❖ Contact Information (e-mail address)	❖ To establish corporate device ❖ To ensure access to SAP systems	❖ To conclude and perform the contract	❖ Controlling Company (abroad) – To give authorization to access the SAP system
❖ Identity Information (name-surname) ❖ Contact Information (phone number, e-mail address) ❖ Employee Operation Information (medical school diploma no., medical school diploma date, workplace physician certificate date, workplace physician document no., e-prescription user name, e-prescription password)	❖ TO keep the record of the workplace physician for the QDMS system ❖ To establish contact with the Workplace Physician	❖ To conclude and perform the contract	-
❖ Contact Information (phone number, e-mail address)	❖ To establish communication	❖ To conclude and perform the contract	-
❖ Identity Information (T.R. ID No., Company reg. no., date of birth, sex) ❖ Personnel Information (wage) ❖ Employee Operation Information (Social Security Institution-SGK initiation date, SGK work commencement date, title)	❖ To prepare severance compensation report	❖ Explicit consent	❖ Business Associate – To receive consultancy service (servers of the business associate providing the service are located abroad)
❖ Personnel Information (wage) ❖ Employee Operation Information (title)	❖ To determine wage benchmark	❖ Explicit consent	❖ Business Associate –To receive consultancy service

<ul style="list-style-type: none"> ❖ Identity Information (name-surname, date of birth, sex) ❖ Employee Operation Information (work commencement date) 	<ul style="list-style-type: none"> ❖ Work engagement research 	<ul style="list-style-type: none"> ❖ Explicit consent 	<ul style="list-style-type: none"> ❖ Business Associate –To receive consultancy service (servers of the business associate providing the service are located abroad)
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b. Members of the Board / Shareholder

Personal Data Processed	Processing Purpose	Legal Reason	Whether it is Transferred in Turkey/abroad, and the Reason of Transfer
<ul style="list-style-type: none"> ❖ Identity Information (name-surname, passport no., citizenship, date of birth) ❖ Transaction Security (signature) 	<ul style="list-style-type: none"> ❖ To conduct general assembly operations 	<ul style="list-style-type: none"> ❖ To fulfill the legal liability 	<ul style="list-style-type: none"> ❖ Business Associates – To receive consultancy service in the conduct of the operation ❖ Government Agencies – To transmit the concerned units
<ul style="list-style-type: none"> ❖ Identity Information (name-surname) ❖ Contact Information (address) ❖ Financial Information (shareholding status) 	<ul style="list-style-type: none"> ❖ To make loan application for the company 	<ul style="list-style-type: none"> ❖ Legitimate interest 	<ul style="list-style-type: none"> ❖ Banks – To make loan application
<ul style="list-style-type: none"> ❖ Identity Information (name-surname, T.R. ID No., mother's and father's name, place of birth, date of birth, civil status, birth record information, previous surname, ID card serial no.) ❖ Visual - Audio Information(photo) 	<ul style="list-style-type: none"> ❖ To share the company's list of authorized signatures with those demanding the same 	<ul style="list-style-type: none"> ❖ Legitimate interest 	<ul style="list-style-type: none"> ❖ Business Associates, Clients Dealers Government Agencies, Other third parties

<ul style="list-style-type: none"> ❖ Data Security Information(signature) ❖ Sensitive Personal Data(religion information, blood type) 			
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c. Dealers, Customers, Contact Persons

Personal Data Processed	Processing Purpose	Legal Reason	Whether it is Transferred in Turkey/abroad, and the Reason of Transfer
<ul style="list-style-type: none"> ❖ Identity Information (name-surname, T.R. ID No.) ❖ Contact Information (office phone no., mobile phone, fax no., e-mail address, address) ❖ Employee Operation Information (title) ❖ Client Information (area of activity, work commencement date) ❖ Data Security Information(tax office and ID) ❖ Finance Information (tax base of previous years) 	<ul style="list-style-type: none"> ❖ To open current account record 	<ul style="list-style-type: none"> ❖ To conclude and perform the contract 	<ul style="list-style-type: none"> ❖ Business Associates – Settlement of legal disputes ❖ Controlling Company (abroad) – SAP record
<ul style="list-style-type: none"> ❖ Identity Information (name-surname) ❖ Contact Information (office phone no., address, e-mail address) 	<ul style="list-style-type: none"> ❖ To send samples ❖ To establish contact with regard to orders and delivery ❖ Product packaging processes 	<ul style="list-style-type: none"> ❖ To conclude and perform the contract 	<ul style="list-style-type: none"> ❖ Controlling Company (abroad) – SAP record
<ul style="list-style-type: none"> ❖ Identity Information (name-surname) 	<ul style="list-style-type: none"> ❖ To conduct clearance and delivery operations 	<ul style="list-style-type: none"> ❖ To conclude and perform the contract 	<ul style="list-style-type: none"> ❖ Business Associates – To conduct customs operations, to

❖ Contact Information (office phone no., e-mail address)			fulfill delivery operations ❖ Controlling Company (abroad) – SAP record
❖ Identity Information (name-surname) ❖ Contact Information (office phone no., mobile phone, fax no., e-mail address) ❖ Employee Operation Information (title)	❖ Contract management ❖ To provide pre-sale and post-sale services	❖ To conclude and perform the contract	-
❖ Identity Information (name-surname) ❖ Contact Information (office phone no., mobile phone, fax no., e-mail address) ❖ Employee Operation Information (title)	❖ Preparation of the order	❖ To conclude and perform the contract	❖ Controlling Company (abroad) – SAP record
❖ Identity Information (name-surname) ❖ Legal Transaction Information(signature, real estate information)	❖ To secure the receivables with regard to orders	❖ To conclude and perform the contract	❖ Banks – To make collections ❖ Controlling Company (abroad) – SAP record
❖ Identity Information (name-surname) ❖ Contact Information (office phone no., mobile phone, fax no., e-mail address) ❖ Employee Operation Information (title)	❖ To make client visits, to make sales ❖ To carry out quality audits and to conduct these processes	❖ To conclude and perform the contract	❖ Controlling Company (abroad) – SAP record
❖ Identity Information (name-surname)	❖ To make collections via mail order	❖ To conclude and perform the contract	-

<ul style="list-style-type: none"> ❖ Contact Information (phone number, e-mail address) ❖ Data Security Information(signature) ❖ Financial Information (bank and branch, credit card number, date of expiry and security no.) 			
<ul style="list-style-type: none"> ❖ Identity Information (name-surname, T.R. ID No., central registration system no.) ❖ Contact Information (office phone no., mobile phone, address) ❖ Employee Operation Information (title) ❖ Client Information (title, area of activity, work commencement date, tax office and ID, tax base of previous years) ❖ Finance Information (bank and branch number, bank account number) 	<ul style="list-style-type: none"> ❖ To come to a commercial agreement ❖ To keep accounting records, 	<ul style="list-style-type: none"> ❖ To conclude and perform the contract 	<ul style="list-style-type: none"> ❖ Business Associates – To receive e-book, e-invoice and storage service, Settlement of legal disputes ❖ Controlling Company (abroad) – SAP record
<ul style="list-style-type: none"> ❖ Identity Information (name-surname) ❖ Contact Information (office phone no., mobile phone, fax no., office address, e-mail address) ❖ Employee Operation Information (title) ❖ Client Information (the firm the client works for) 	<ul style="list-style-type: none"> ❖ To establish contact, to provide information on products, to make announcements ❖ To promote new products and to provide information on campaigns ❖ To send printed materials or promotional material 	<ul style="list-style-type: none"> ❖ To conclude and perform the contract 	<ul style="list-style-type: none"> ❖ Business Associates – to transmit the message

<ul style="list-style-type: none"> ❖ Identity Information (name-surname) ❖ Contact Information (office phone no., mobile phone, fax no., office address, e-mail address) ❖ Employee Operation Information (title) ❖ Client Information (the firm the client works for) 	<ul style="list-style-type: none"> ❖ To make the dealer employees use various campaigns 	<ul style="list-style-type: none"> ❖ To conclude and perform the contract 	<ul style="list-style-type: none"> ❖ Business Associates – IT companies
<ul style="list-style-type: none"> ❖ Identity Information (name-surname) ❖ Contact Information (office phone no., mobile phone, fax no., office address, e-mail address) ❖ Employee Operation Information (title) 	<ul style="list-style-type: none"> ❖ To send commercial electronic messages for advertisement and marketing purposes 	<ul style="list-style-type: none"> ❖ To have it provided in the law 	<ul style="list-style-type: none"> ❖ Business Associates – To receive electronic message sending service ❖ Potential clients – Product and sample provision ❖ Competition Authority – To fulfill the legal liability ❖ TSE (Turkish Standards Institute) – To fulfill the legal liability
<ul style="list-style-type: none"> ❖ Identity Information (name-surname) ❖ Contact Information (phone number) ❖ Employee Operation Information (the dealer the employee works for) 	<ul style="list-style-type: none"> ❖ To make the Dealers muse campaigns of the Let the Baker Win app 	<ul style="list-style-type: none"> ❖ To conclude and perform the contract 	<ul style="list-style-type: none"> ❖ Business Associate – cargo shipment
<ul style="list-style-type: none"> ❖ Identity Information (name-surname, sex) ❖ Contact Information (work phone number, 	<ul style="list-style-type: none"> ❖ To create a database on the market within the scope of customer 	<ul style="list-style-type: none"> ❖ Open consent 	<ul style="list-style-type: none"> ❖ CRM database,, Controlling Company (abroad)

<p>mobile phone, the firm the contact works for, title, address, e-mail address)</p> <ul style="list-style-type: none"> ❖ Data Security Information (log records) ❖ Marketing Information (survey questions) ❖ Financial Information (tax ID) 	<p>relations management program</p>		<p>– To create client marketplace record</p>
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d. Supplier and Contact Person

Personal Data Processed	Processing Purpose	Legal Reason	Whether it is Transferred in Turkey/abroad, and the Reason of Transfer
<ul style="list-style-type: none"> ❖ Identity Information (Name-Surname) ❖ Contact Information (Office Phone, Address, Email Address, Mobile Phone, Fax No) ❖ Personnel Operation Information (Title) 	<ul style="list-style-type: none"> ❖ Contract Management ❖ Fulfillment of Operations to Make Order Ready ❖ Customs and Shipping Operations ❖ Contact for Orders and Shipping 	<ul style="list-style-type: none"> ❖ To conclude and perform the contract 	<ul style="list-style-type: none"> ❖ Partners – Handling Customs Operation, fulfillment of Shipping, translations – Relevant Consulate – carrying out regulations of relevant country ❖ Managing Company (Foreign) – SAP registry
<ul style="list-style-type: none"> ❖ Identity Information (Name-Surname, TR ID, Mersis No) ❖ Contact Information (Telephone No, Fax No, Email Address, Address) ❖ Personnel Operation Information (title) 	<ul style="list-style-type: none"> ❖ Purchase Operations 	<ul style="list-style-type: none"> ❖ To conclude and perform the contract 	<ul style="list-style-type: none"> ❖ Managing Company (Foreign) – SAP registry

<ul style="list-style-type: none"> ❖ Operation Security Information (Tax Office and No, Signature) ❖ Financial Information (Paid Tax Base and Amount, IBAN No, Bank Name and Branch Info) ❖ Customer Information (Work Start Date, Area of Activity) 			
<ul style="list-style-type: none"> ❖ Identity Information (Vehicle Plate Info, Name-Surname) ❖ Contact Info (Company Phone, Mobile Phone) ❖ Citizen Info (SGK Employment Registry) ❖ Personnel Operation Information (Place of Work) 	<ul style="list-style-type: none"> ❖ Drivers Records ❖ Security ❖ Confirmation that Worker is Insured 	<ul style="list-style-type: none"> ❖ Legitimate interest ❖ Explicit Consent 	<ul style="list-style-type: none"> ❖ Customers Shipping Information Transmission - ❖ Other Suppliers Completion of Shipping Info - ❖ Port Management - Management Request
<ul style="list-style-type: none"> ❖ Identity Information (Name-Surname, TR ID, Date of Birth) ❖ Contact Information (Office Phone, Mobile Phone, Email Address) ❖ Personnel Operation Information (company, title) ❖ Operation Security Information (Signature) ❖ Physical Area Security Information (Camera Record, Entry-Exit Hours) 	<ul style="list-style-type: none"> ❖ To have quality and food safety inspections ❖ Evaluation of Audit Results 	<ul style="list-style-type: none"> ❖ To conclude and perform the contract 	<ul style="list-style-type: none"> ❖ Work Partners - Travel Reservations
<ul style="list-style-type: none"> ❖ Identity Information (Name-Surname) ❖ Contact Information (Office Phone, Mobile Phone, Fax No, Email Address) 	<ul style="list-style-type: none"> ❖ Supplier Audit Visits 	<ul style="list-style-type: none"> ❖ Legitimate interest 	<ul style="list-style-type: none"> -

❖ Personnel Operation Information (company, title)			
❖ Audit and Inspection Info (Helal and Kosher Documents)	❖ To Carry Out Quality Standard Determination	❖ Legitimate interest	❖ Customers – Communicate the supplier's document requirements
❖ Identity Information (Name-Surname) ❖ Contact Information (Office Phone, Mobile Phone, Fax No, Email Address) ❖ Personnel Operation Information (title)	❖ Communication	❖ To conclude and perform the contract	-
❖ Identity Information (Name-Surname, TR ID, Mersis No) ❖ Contact Information (Office Phone, Mobile Phone, Address) ❖ Personnel Operation Information (title, Area of Activity, Employment Date, Tax Office and No, Tax Base of Previous Years) ❖ Finance Information (Bank and Branch Info, Bank Account No)	❖ Commercial Consensus ❖ Accounting Record	❖ To conclude and perform the contract	❖ Work Partners – E-book, E-Invoice and Storage Service, Resolution of Legal Incompatibility ❖ Managing Company (Foreign) – SAP registry
❖ Identity Information (Name-Surname) ❖ Personnel Operation Information (company) ❖ Physical Area Security Information (Entry-Exit Hours)	❖ Record of Entry and Exit to Factory and Security	❖ Legitimate interest	-

e. Let the Baker Win Application Members

Personal Data Processed	Processing Purpose	Legal Reason	Whether it is Transferred in Turkey/abroad, and the Reason of Transfer
<ul style="list-style-type: none"> ❖ Identity Information (Name-Surname) ❖ Contact Info (Telephone No, Address) ❖ Customer Information (company, title, Tax No, company address), ❖ Operation Security Information (membership password) ❖ Customer Operation Info (log records) 	<ul style="list-style-type: none"> ❖ Membership Registration 	<ul style="list-style-type: none"> ❖ Explicit Consent 	<ul style="list-style-type: none"> ❖ Work Partners – Database, SMS and Email Sending, procurement of social media targeting service (Some servers of Work Partners are abroad), resolution of legal disagreement ❖ Dealers – Improving the performance of the loyalty program and identifying fraudulent transactions
<ul style="list-style-type: none"> ❖ Identity Information (Date of Birth) ❖ Contact Info (Email Address, Telephone No) ❖ Customer Operation Info (number of login) 	<ul style="list-style-type: none"> ❖ Realization of marketing activities through application ❖ Sending of Commercial Email 	<ul style="list-style-type: none"> ❖ Explicit Consent 	<ul style="list-style-type: none"> ❖ Work Partners – Database, SMS and Email Sending, procurement of social media targeting service (Some servers of Work Partners are abroad)
<ul style="list-style-type: none"> ❖ Marketing Information (product usage habits) 	<ul style="list-style-type: none"> ❖ Performing a segmentation study on the application 	<ul style="list-style-type: none"> ❖ Explicit Consent 	<ul style="list-style-type: none"> ❖ Work Partners – Database, procurement of social media targeting and segmentation service (Some servers of Work Partners are abroad)

❖ Customer Operation Info (log records)	❖ Analysis studies to increase the use of the application	❖ Explicit Consent	❖ Work Partners – Database, procurement of social media targeting and segmentation service (Some servers of Work Partners are abroad)
❖ Identity Information (TR ID) ❖ Contact Info (Order Address)	❖ Delivery of orders placed via the application	❖ Explicit Consent	❖ Work Partners – Procurement of Database Service (Some servers of Work Partners are abroad) ❖ Dealers – Shipment of Orders
❖ Identity Information (Name-Surname, sex) ❖ Contact Information (work telephone, Mobile Phone, company, title, Address, Email Address) ❖ Financial Information (Tax No) ❖ Operation Security Information (log records) ❖ Marketing Information (Used yeast brand, daily yeast consumption, supplier agent, other research questions)	❖ Creation of Database under Customer Relation Management Program ❖ Social media targeting to inform products and campaigns	❖ Explicit Consent	❖ CRM Database, Managing Company (abroad) – Creation of Customer Market Database ❖ Work Partners – Procurement of Database Service for Application (Servers of Work Partners providing the service is at abroad)

f. Access Providers

Personal Data Processed	Processing Purpose	Legal Reason	Whether it is Transferred in Turkey/abroad, and
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			the Reason of Transfer
<ul style="list-style-type: none"> ❖ Identity Information (Name-Surname, sex) ❖ Contact Info (Telephone No, Address) ❖ Customer Information (company, Mobile Phone brand), ❖ Marketing Information (call date, name of dealer, used yeast brand, Variety of Bread) ❖ Visual and Audi Info (Voice Records) 	<ul style="list-style-type: none"> ❖ Call Center Calls and Reply of Contact Form 	<ul style="list-style-type: none"> ❖ Fulfillment of Legal Obligation ❖ Explicit Consent 	<ul style="list-style-type: none"> ❖ Work Partners – Procurement of Database Service (Some servers of Work Partners are abroad)
<ul style="list-style-type: none"> ❖ Identity Information (Name-Surname) ❖ Contact Info (Telephone No, Email Address) ❖ Customer Information (company, Company Address) ❖ Marketing Information (demo requested product, used yeast brand, Variety of Bread) 	<ul style="list-style-type: none"> ❖ Management of Social Media Messages ❖ Registry of Request ❖ Meeting information and demo request 	<ul style="list-style-type: none"> ❖ Fulfillment of Legal Obligation 	<ul style="list-style-type: none"> ❖ Work Partners – procurement of media messages management service (Some servers of Work Partners are abroad), ❖ Dealers – Shipping of Order and Demo
<ul style="list-style-type: none"> ❖ Identity Information (Name-Surname) ❖ Contact Info (Telephone No, Email Address) ❖ Customer Information (company, company address) ❖ Customer Operation Info (log records) ❖ Marketing Information (used yeast brand, Name of Dealer that Provided Product) 	<ul style="list-style-type: none"> ❖ Campaign Registry and Campaign Operations 	<ul style="list-style-type: none"> ❖ To conclude and perform the contract ❖ Fulfillment of Legal Obligation ❖ Explicit Consent ❖ Legitimate interest 	<ul style="list-style-type: none"> ❖ Work Partners – Procurement of Database Service (Some servers of Work Partners are abroad) ❖ Dealer – Realization of Campaign Dispatches ❖ Official Institution – Fulfillment of Legal Obligation
<ul style="list-style-type: none"> ❖ Identity Information (Name-Surname) 	<ul style="list-style-type: none"> ❖ Providing Information on 	<ul style="list-style-type: none"> ❖ Explicit Consent 	<ul style="list-style-type: none"> ❖ Work Partners – Procurement of Electronic

<ul style="list-style-type: none"> ❖ Contact Info (Telephone No, Email Address) ❖ Customer Operation Info (log records) 	<ul style="list-style-type: none"> ❖ Campaign, Advertising ❖ Social media targeting to inform products and campaigns 		Message Sending Service
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g. Bakeries

Personal Data Processed	Processing Purpose	Legal Reason	Whether it is Transferred in Turkey/abroad, and the Reason of Transfer
<ul style="list-style-type: none"> ❖ Identity Information (Name-Surname) ❖ Contact Info (Telephone No, Email Address) ❖ Customer Information (company, company address) ❖ Visual and Audi Info (photography and video) ❖ Reputation Management Information (speeches) ❖ Operation Security Information (Signature) 	<ul style="list-style-type: none"> ❖ Receive comments about products, companies and campaigns and share them on the Internet 	<ul style="list-style-type: none"> ❖ Explicit Consent 	<ul style="list-style-type: none"> ❖ Work Partners – Database service, procurement of service to publish printed materials on website, social media and mobile application (Some servers of Work Partners are abroad)

h. Visitors, Subcontractors Personnel, Training and Training Participants

Personal Data Processed	Processing Purpose	Legal Reason	Whether it is Transferred in Turkey/abroad, and the Reason of Transfer
<ul style="list-style-type: none"> ❖ Identity Information (Name-Surname) ❖ Customer Information (company) 	<ul style="list-style-type: none"> ❖ Creation of Visitors' Log and Tracking 	<ul style="list-style-type: none"> ❖ Legitimate interest 	-

❖ Physical Area Security Information (Camera Record, Entry-Exit Hours)			
❖ Identity Information (Name-Surname) ❖ Customer Information (company) ❖ Operation Security Information (Signature) ❖ Specially Qualified Personal Data (health information)	❖ Registration of visitors to the factories within the scope of food safety requirements	❖ Legitimate interest ❖ Explicit Consent	-
❖ Identity Information (name-surname, TR ID) ❖ Contact Information (Telephone No) ❖ Personal Information (SGK Service Scheme, payroll info) ❖ Specially Qualified Personal Data (health report)	❖ Record of Subcontractors' Records ❖ Contact ❖ Control over Fulfillment of Legal Obligation ❖ Ensuring food safety	❖ To conclude and perform the contract ❖ Explicit Consent	-
❖ Identity Information (Name-Surname) ❖ Physical Area Security Information (Camera Record, Entry-Exit Hours)	❖ Safety of Workplace, environment monitoring	❖ Legitimate interest	❖ Work Partners – procurement of consultancy for legal disagreements
❖ Identity Information (Name-Surname) ❖ Personnel Operation Information (company)	❖ Creation of Instructor Records and Tracking	❖ To conclude and perform the contract	-
❖ Identity Information (Name-Surname, sex) ❖ Contact Information(work telephone, Mobile	❖ (For training participants) Creation of Database on Market	❖ Explicit Consent	❖ CRM Database, Managing Company(abroad) – Creation of

<ul style="list-style-type: none"> ❖ Phone, company, title, Address, Email Address) ❖ Operation Security Information(log records) ❖ Marketing Information (anket soruları) ❖ Financial Information(Tax No) 	<ul style="list-style-type: none"> ❖ under the Customer Relations Management Program ❖ Sending of Commercial Email 		<ul style="list-style-type: none"> ❖ Customer Market Database ❖ Work Partners – Procurement of Electronic Message Sending Service
<ul style="list-style-type: none"> ❖ Identity Information (Name-Surname) ❖ Contact Information(Office Phone, Mobile Phone) ❖ Customer Information(company) 	<ul style="list-style-type: none"> ❖ Baking Center Training Process 	<ul style="list-style-type: none"> ❖ To conclude and perform the contract 	-

3.4. Record Mediums

The following provides information on how the said Personal Information is collected.

Data Owner Category	Data Collection Form
Employee/Employee Candidate	Via Verbal, Written or Email
Dealer and/or Dealer Contact Person	Via Verbal, Written or Email
Customer and/or Customer Contact Person	Via Verbal, Written or Email
Supplier and/or Supplier Contact Person	Via Verbal, Written or Email
Members of Let the Baker Win	Via Verbal, Written and Electronic
Access Providers	Via Verbal, Written and Electronic
Visitors	Via Verbal or Visual
Other	Via Verbal, Written, Electronic

Our Company keeps the Personal Data collected as set out above in a secure medium in accordance with law.

Electronic Mediums	Non-Electronic Mediums
<ul style="list-style-type: none"> ❖ Servers (domain, backup, email, database, web, file sharing, etc.) ❖ Softwares (office softwares, portal) ❖ Information Security Devices (security wall, attack determination and prevention, daily logs, antivirus etc.) 	<ul style="list-style-type: none"> ❖ Paper, file ❖ Manual data recording systems (visitor logbook) ❖ Written, printed, visual mediums

<ul style="list-style-type: none"> ❖ Personal Computers (desktop, laptop) ❖ Mobile devices (telephone, tablet etc.) ❖ Optic discs (CD, DVD etc.) ❖ Removable storages (USB, memory card etc.) ❖ Printer, Scanner, photocopy machine 	
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4. Transfer of Personal Data

Our Company can transfer the Personal Data acquired in accordance with data processing purpose under the Article 3rd of this Policy to third persons in the country or abroad in accordance with 8th Article of the Law for purpose specified at the Article 3.3 of this Policy. As a member of Lesaffre Company Groups in a global sense, our Company complies with the security policy published by the Company groups. In this sense, some part of Personal Data at our Company is shared with the Managing Company for audit, business development or global integration or shared with abroad as common system servers of the company group is at abroad. Also, domestic work partners that we send data transfer Personal Data abroad as some of their softwares' servers are at abroad. Our Company strictly considers the Law and subregulations and the Personal Data Protection Committee's resolution ("KVKK") when sending the Personal Data abroad.

5. Personal Data Storage

5.1. Purpose of Storing Personal Data

The Personal Data is processed for aims as set out in the Article 3rd under the Company's activities and retained as evidence for possible legal disagreements in the future.

5.2. Storage Period

The Personal Data used at the Company's activities and specified at the Article 3rd is processed for the activity period on the ground that the usage purpose of data continues and is retained for the period provided by relevant law and subregulations or the period that is required to retain after the aim of usage is over, and once the period is over, the Personal Data will be deleted, destructed or anonymized in accordance with the relevant provisions of the Regulation on Personal Data Deletion, Destruction, and Anonymization.

Within this scope, the relevant regulations that our Company is subjected to and determines the storage period for Personal Data is listed bellows:

Turkish Code of Obligations No. 6098 • Social Security and General Health Insurance Law No. 5510 • Occupational Health and Safety Law No. 6331 • Labor Law No. 4857 • Turkish Commercial Code No. 6102 • Customs Law No. 4458 • Law No. 6563 on the Regulation of Electronic Commerce • other secondary regulations in force in accordance with these laws

Apart from the legislation, your Personal Data is retained by the Company for the following periods from the end of its intended use:

Relevant Person	Storage Period
Employee/Employee Candidate	6 month - 10 years
The Board / Shareholder	10 years
Dealer / Contact Person	1 month - 10 years
Customer / Contact Person	3 month - 10 years
Supplier / Contact Person	3 month - 10 years
Members of Let the Baker Win	6 month - 1 year
Access Providers	6 month - 1 year
Bakeries	6 month
Visitors, Sub Employer Personnel and Instructors and Participants	6 month – 10 years

6. Technical and Administrative Measures Taken by Our Company

The following technical and administrative measures are taken by our Company in accordance with the legislation in order to ensure the safe storage of your Personal Data and to prevent unlawful processing and access.

6.1. Administrative Measures

- Personnel has training to process the Personal Data in line with the Law, to prevent the processing of Personal Data against law, to prevent unauthorized access to the Personal Data against law, training on communication techniques and technical information skills, and precautions to develop personnel's awareness have been taken.
- Personnel sign the confidentiality agreements and commitments.
- Contracts signed with customers, suppliers, and solution partners have provisions on the protection of Personal Data or the additional protocols have been signed with them.
- Necessary legal and technical consultancy services have been obtained in order to prevent unauthorized access to Personal Data owned by our Company and to prevent unlawful processing, storage, and transfer of such data. So, internal processes were carried out and administrative and technical measures were taken.
- Before starting the processing of personal data, the Company carries out its obligation to inform the persons concerned.
- The inventory on the personal data processing has been prepared.
- Period checks are carried out.
- Personal Data in physical environment is kept in lockers; cabinet keys are only given to people who need access to that data for business purposes.

6.2. Technical Measures

- Network security and application security are carried out.
- The security of personal data stored on the cloud is ensured.
- Discipline regulation including the data security provisions for personnel was prepared.
- Routine training and awareness works for personnel on the personal data is carried out.
- Access logs have been retained regularly.
- Institutional policies on access, information security, usage, storage, and deletion have been prepared and implemented.
- Data masking, if necessary, is implemented.
- Confidentiality commitments are carried out.
- The authority of personnel that changed their roles or left the company is removed.
- Current anti-virus system is used.
- The security wall is active.
- Signed contracts have provisions on the data security.
- Extra security measures are taken for personal data transferred via paper, and the related documents are sent in confidential document format.
- Personal data security policies and procedures have been established.
- Personal data security issues are reported quickly.
- The personal data security is followed.
- Necessary security precautions for physical environments containing personal data is taken.
- Physical environments containing personal data are protected against external risks (fire, flood, etc.).
- The security of mediums containing personal data is ensured.
- Personal data is reduced as much as possible.
- Personal data has backups, and the security of these backups is ensured.
- User account management and authorization control system are applied, and they are followed.
- Periodic and/or random audits within the company are conducted.
- User cannot intervene into log records.
- Protocols and procedures on Specially Qualified Personal Data's security are determined and applied.
- Pentests are applied.
- Cyber security measures are in place and their applications are on watch.

7. Personal Data Deletion, Destruction, and Anonymization

When the necessary conditions for the processing of personal data are no longer available, the Personal Data will be deleted, destructed, and anonymized in line with specified rules set out in the relevant provisions of the Law and the Regulation on Personal Data Deletion, Destruction, and Anonymization. Also, under the relevant legislation provisions and Article 138 of Turkish Criminal Code, the Personal Data whose processing and storage period are over will face deletion, destruction or anonymized in similar fashion.

The Company will destruct the Personal Data that is required to be deleted, destructed or anonymized under the destruction policy as set out by this Policy and under the relevant regulation as of the publication date of this Policy in accordance with the deletion, destruction or anonymization procedures.

7.1. Reason for Destruction

The Company deletes, destructs or anonymizes the Personal Data in the following cases:

- Relevant legislation provisions as the basis of processing of personal data is amended or annulled.
- Purpose for the processing or retention is over.
- The relevant person retracts the explicit consent when the explicit consent is necessary for the processing of personal data.
- The Company accepts the application by the relevant person to delete and destruct the Personal Data under the Article 11th of the Law on the person's rights.
- The company rejects the relevant person's request to delete, destruct or anonymizes his/her personal data, and the response of the company is found to be inadequate or the Company fails to respond within the period envisaged by the law; the relevant person make compliant against the Company at KVKK and KVKK finds this application appropriate.
- The maximum term for the retention of Personal Data as specified by this Policy is over and there is no condition that legitimates the longer retention of Personal Data.

7.2. Destruction Techniques

Your Personal Data will be destructed in accordance with the relevant legislation with the following techniques:

a. Deletion

Personal data in all information technology environments is deleted using the "delete" method within the scope of the first periodic deletion after the expiry of the maximum period. Deletion of personal data is the process of making personal data inaccessible and unusable for the users concerned. The access of all users apart from the Information Technology Department to records at SAP, SAP HR, and EBA applications, relevant Database tables, and on email system and file servers are removed. IT Department stores the relevant audit traces on the deletion operation at LogSign application.

Users need to cut and paste documents that will be deleted because of personal data into the common file. Users cannot access to these documents transferred to the common file. Because of the automatic deletion specified for this file, this file will be deleted in six months. IT Department is responsible for this process. All operations in the common file are logged with File Audit Software.

Access to personal data on backups created for emergency access is available only to the IT Department. If the data on backups are transferred to production area during emergency or return test from backups, personal data that once was destructed at the previous destruction works and exists at the returned data will be deleted before providing access to relevant

users. Audit trace on this destruction operation after the return from the backups will be stored safely by the IT Department.

b. Destruction

The personal data contained in the paper medium is destroyed using the “destruction” method within the scope of the first periodic destruction after the expiry of the maximum period. Destruction of personal data is the process in which personal data cannot be accessed, retrieved or reused by anyone in any way. When this process is carried out, the media is divided into small pieces with the paper shredders / trimmers, if possible, horizontally and vertically so that they cannot be reassembled. During the destruction, the person responsible for the destruction of the relevant data is accompanied by an employee from the Compliance Team and the Personal Data Destruction Report is completed and signed. These reports are securely stored in the Common File area by the Compliance Team.

Once the required period to retain personal on optic media and magnetic media is over, these mediums are subjected to physical destruction such as melting, burning or powdering. Also, the magnetic medium is subjected to high degree of magnetic exposure that renders data unreadable.

c. Anonymization

The anonymization of personal data means that personal data cannot be associated with an identified or identifiable natural person, even if it is mapped to other data. This destruction method is not used in our company.

7.3. Periodic Destruction Period

Our company has determined the period of periodical destruction as 6 months, and periodic destruction is carried out every year in December and June.

8. Information on People Taking Part in Storage and Destruction Process

For the prevention of processing the Private Data illegally, preventing the illegal access to Private Data, storing the Private Data legally and for the supervision of those working in the units regarding these issues, our primary employees taking a part in the implementing the technical and administrative measures within the framework of this Policy as required are shown below

Department	Title	Duty
General Directorate	General Director	Responsible for the employees to act according to the Policy.
Information Processing Department	Information Processing Director	Responsible for proposing technical solutions and their implementation for the procurement of implementing the Policy.
Other Departments	Director of Finance, Director of Human	Responsible for the Policy to be conducted according to the duties.

	Resources, Director of Accounting, Director of Marketing, Director of Domestic Sales, Director of Abroad Sales, Director of Purchase and Logistics	
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9. Right and Request of Personal Data Owners

9.1. Data Owners' Rights

You may use your rights as Personal Data Owner at any time by contacting our Company as Data Supervisor under Article 11 of the Law.

- To know whether owned personal data is processed or not,
- to request information if his/her personal data are processed
- to learn the purpose of his/her data processing and whether this data is used for intended purposes
- To know the third persons that Personal Data is transferred to, to correct errors on the Personal Data and to request the correction of that data if this data is transferred,
- Once the reason for the processing Personal Data is over, the request to delete, destruct or anonymize within thirty days in line with the Regulation Provisions of Personal Data Deletion, Destruction or Anonymization, and if that data is transferred, the transmission of this request to third persons,
- To raise objection against any negative result as a result of processed data,
- In case of damages caused by illegal data processing, request the damages within the law.

9.2. Application Method and Evaluation of Requests

Pursuant to Article 13 of the Law on the Deletion, Destruction and Anonymization of Personal Data, necessary preparations and works have been carried out in order to fully and legally exercise the rights granted to the persons who own the Personal Data. In order to transmit your requests as specified in the Article 11 of the Law, you can get in touch with our company at any time to contact address as specified at the Application Form accessible at <https://www.lesaffre.com.tr/kisisel-verilerin-korunmasi/> (i) via Public Notary (ii) registered mail via PTT (iii) making application with electronic signature as set out in 5070 numbered Law to registered email address (KEP) of the Data Supervisor (iv) your email address that is delivered to our company before and remains registered in our company system.

The Company will respond to written requests of data owners within 30 (thirty) days at the latest and ensure necessary actions are carried out. Applications will be made free of charge unless KVKK issues a fee schedule. If the number of pages for response exceeds 10 (ten) pages, for each page 1,00 (one) Turkish liras will be collected. If the response is requested

on a recording medium such as CD, flash memory, a fee will be charged according to the cost of the desired recording medium.

In order to provide a complete and secure service to the data owners, our company may request additional information and documents from the data owner, especially the Identity Information of the data owner.

10. Policy Update

The content of this Policy is reviewed as necessary, and the necessary sections are updated. The update information and the old copies will be shown in this section.

LESAFFRE TURQUİE MAYACILIK ÜRETİM VE TİCARET A.Ş.