

# KHAZANAH TURKEY REGIONAL OFFICE DANIŞMANLIK HİZMETLERİ ANONİM ŞİRKETİ

## GENERAL DATA PROTECTION POLICY

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### 1. YOUR PRIVACY

- 1.1 **KHAZANAH TURKEY REGIONAL OFFICE DANIŞMANLIK HİZMETLERİ ANONİM ŞİRKETİ** ("KTRO", "us", "we" or "our") is committed to protecting your privacy and will take the relevant measures to safeguard your personal information in accordance with the Data Protection Law numbered 6698 (the "Law") and other relevant legislation. This Data Protection Policy (the "Policy") sets out how we use and protect the information you give us.
- 1.2 Your personal data will be held by us in accordance with the Law. For the purposes of the Law, the data controller is **KHAZANAH TURKEY REGIONAL OFFICE DANIŞMANLIK HİZMETLERİ ANONİM ŞİRKETİ** of Büyükdere Caddesi No:185 Kanyon İş Merkezi Kat:15 34394 Levent-Şişli/İstanbul (Trade Registration No. 855623).

### 2. YOUR PERSONAL DATA

#### Categories of personal data

- 2.1 We, or a service provider engaged by us, may collect and process personal data from you. The personal data collected from you may include (but may not be limited to) personal data that falls into the following categories of data:
- 2.1.1 name;
  - 2.1.2 personal, business, and emergency contact information (including home address, email address, phone number, gender, marital status);
  - 2.1.3 date of birth;
  - 2.1.4 signature;
  - 2.1.5 bank account details;
  - 2.1.6 national ID number or passport number (or other identification numbers as appropriate, e.g. social security number or national insurance number);
  - 2.1.7 nationality and place of birth; and
  - 2.1.8 other personal data as may be required from time to time for business planning and management.

#### How we will collect your data

- 2.2 We may collect and process your personal data for various legal reasons in the ways set out below:
- 2.2.1 We may collect and process information that you provide by filling in forms for us (whether electronic or not). This includes information (such as your

email address) provided at the time of responding to any request for information from us.

2.2.2 We may collect and process information that you provide us as part of a business relationship or contract.

2.2.3 If you contact us, we may keep a record of that correspondence.

2.2.4 We may collect and process details of your visits to our website (if any) including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access.

2.2.5 We may collect and process your personal data from third parties, our business partners or from publicly-available sources.

### 3. **PURPOSE OF PROCESSING AND USES MADE OF THE INFORMATION**

3.1 We collect and use information held about you in the following ways:

3.1.1 To ensure that content from our website (if any) is presented in the most effective manner for you and for your computer.

3.1.2 To provide you with any information that you request from us or which we feel may interest you, including information on networking and stakeholder events organised by KTRO and/or any of our group companies (which means our subsidiaries, our ultimate holding company and its subsidiaries), or any of its related and associate companies and affiliates as well as any company in which we, or any of our group companies, have an investment (together, the “**KTRO Group**”), as permitted under applicable law or where you have consented to be contacted for such purposes.

3.1.3 To carry out our obligations arising from any contracts entered into between you and us.

3.1.4 To evaluate your suitability to render the relevant services to KTRO or any members of the KTRO Group.

3.1.5 To comply with our obligations and any requests received regarding background and security screening, including KYC and AML screening

3.1.6 To prepare and execute legal documents.

3.1.7 To process payments, and comply with our accounting and tax obligations.

3.1.8 For administrative purposes.

3.1.9 For contact purposes.

3.1.10 To comply with our obligations regarding security and access within the KTRO Group.

3.1.11 To investigate complaints and suspected suspicious transactions.

3.2 Your information is necessary to us. If you do not provide all of the personal data that we request from you, we may not be able to fulfil all of the functions set out in paragraph 3.1 above.

#### 4. **WHERE WE STORE PERSONAL DATA AND DISCLOSURE OF YOUR DATA**

4.1 Where we transfer your personal data outside Turkey and where the country or territory in question does not maintain adequate data protection standards, we will take reasonable steps to ensure that your data is treated securely and in accordance with the Law (Article 9 of the Law).

4.2 Unless you specify otherwise, we may disclose your personal information to:

4.2.1 any member of the KTRO Group including but not limited to those located in Malaysia, the United States of America, Europe, China and India;

4.2.2 third parties in the follow circumstances including those outside Turkey:

(A) in the event that KTRO sells or buys any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;

(B) if KTRO or substantially all of its assets are acquired by a third party, in which case personal data held by it will be one of the transferred assets;

(C) agents, service providers and third parties who provide services relating to the purposes for which the personal data is collected and processed including data processing services, or for the purpose of providing network or administrative services, whether or not such agents, service providers and third parties are based in Turkey;

(D) any person who is under a duty of confidentiality and has undertaken to keep such data confidential; and

(E) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of KTRO or any members of the KTRO Group, our business partners or others or if requested by a financial institution, regulator or any governmental authority.

4.3 We do not disclose your personal data to other unaffiliated third parties other than those indicated in this Policy without your consent. However, we may disclose your personal data if required by law or in good faith, if such action is necessary to comply with any law enforcement agency requirements, court orders or legal processes.

#### **Retention**

If we no longer need to use your personal data for the purposes set out in paragraph 4 above and/or we are not legally required to retain your personal data, we will take reasonable steps to destroy your personal data or render it anonymous in accordance with applicable laws and regulations.

## 5. SECURITY MEASURES

- 5.1 We will take all reasonable precautions necessary to protect your personal data from:
- 5.1.1 misuse, interference and loss; and
  - 5.1.2 unauthorised access, processing, modification or disclosure.
- 5.2 We may use third party data storage providers (such as cloud service providers) to store personal information electronically. We take reasonable steps to ensure this information is held as securely as information stored on our own equipment.
- 5.3 Please note that, unfortunately, there is always risk involved in sending information through any channel over the internet. Any information you send to us over the internet is entirely at your own risk. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted over the internet and we do not warrant the security of any information, including personal data, which you transmit to us over the internet.
- 5.4 Where we transfer your personal data outside Turkey and where the country or territory in question does not maintain adequate data protection standards, we will take reasonable steps to ensure that your data is treated securely and in accordance with this Policy.
- 5.5 In the event of a personal data security incident, we will inform you and the Turkish Personal Data Protection Board as soon as possible (in accordance with applicable laws and regulations). When it is not possible to notify a person on an individual basis in despite of reasonable efforts, we will issue an announcement in a reasonable and effective manner.

## 6. RIGHTS OF THE DATA SUBJECT PRESCRIBED UNDER ARTICLE 11 OF THE LAW

- 6.1 In case you, as the data subject, convey your requests relating to your rights to KTRO by means stated under this Policy, such requests, depending on the content of the request, shall be concluded within thirty (30) days. In this respect you are entitled to:
- learn whether data relating to you is being processed;
  - request further information if personal data relating to you has been processed;
  - learn the purpose for which your personal data is being processed and whether your personal data is being processed in accordance with this purpose;
  - know the third parties to which we transfer your personal data (whether that is in Turkey or abroad);
  - request rectification of the processed personal data which is incomplete or inaccurate and request such process to be notified to third parties to which we transfer your personal data;
  - request erasure or destruction of data if the data is no longer necessary in relation to the purpose for which the personal data was collected, despite being

processed in line with the Data Protection Legislation and request such process to be notified to third parties to which we transfer your personal data;

- object to any decision that negatively affects you being taken solely by an automated system; and
- demand compensation for damages you have suffered as a result of unlawful Processing.

## 7. **ACCESS, CORRECTIONS, DELETION AND COMPLAINTS**

7.1 Your right to request access, correct or delete your personal data held by us can be exercised in accordance with the Law. You may access, correct or delete your personal information by contacting our Data Protection Compliance Manager at ***KTRO.pdofficer@khazanah.com***

7.2 If you have a concern about how we have handled your personal data, please let us know so we can fix the problem. You can contact us at ***KTRO.pdofficer@khazanah.com***

To lodge a complaint, please send details to our Data Protection Compliance Manager in writing. We treat all privacy complaints seriously and any complaint will be assessed by our Data Protection Compliance Manager with the aim of resolving any issue in a timely and efficient manner. We request that you cooperate with us during this process and provide us with any relevant information that we may need to investigate the complaint appropriately.

## 8. **MONITORING AND REVIEW OF POLICY**

8.1 KTRO may review and change this Policy from time to time to reflect changes in the law, our business practices, processes or structure. This Policy is not a contract, nor does it suggest any obligation on our part with another party.

## 9. **HOW TO CONTACT US**

9.1 Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to the Data Protection Compliance Manager at ***KTRO.pdofficer@khazanah.com***