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**STM**

MÜHENDİSLİK  
TEKNOLOJİ  
DANIŞMANLIK


**THE PROTECTION OF PERSONAL DATA AND  
PRIVACY POLICY**

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PROTECTION OF PERSONAL DATA AND PRIVACY POLICY**

## 1. OBJECTIVE

As STM SAVUNMA TEKNOLOJİLERİ MÜHENDİSLİK VE TİCARET A.Ş. (“**STM**” or “**Company**”), we give great importance to the protection of the personal data belonging to all natural persons with whom we have come into contact while fulfilling our commercial operations as of the date on which the Law No. 6698 on the Protection of Personal Data (“**LPPD**” or “**Law**”) went into effect, and to the complete fulfillment of the obligations included in the LPPD in this framework.

This the Protection Personal Data and Privacy Policy (“**Policy**”) was prepared for the purposes of notifying you of the processes and principles of the collection, use, sharing, and storage of personal data by STM. In this Policy, suitable space has been provided for the array of regulations found in the LPPD for the principles regarding the processing by STM of the personal data belonging to data subject, and these explanations encompass STM employees, our active and potential customers, our visitors, and any other natural persons with a relationship with STM.

## 2. SCOPE


This Policy shall be implemented in all STM processes.

## 3. REFERENCES


- Law No. 6998 on the Protection of Personal Data,
- The Regulation on the Erasure, Destruction, or Anonymization of Personal Data.

## 4. DEFINITIONS AND ABBREVIATIONS

Abbreviation	Definition
<b>Explicit Consent</b>	freely given, specific and informed consent,

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Abbreviation	Definition
<b>Relevant User</b>	The people who process personal data within the collector's organization or in line with the authority and instructions they have received from the data controller, excluding persons or units who are responsible for the technical storage, protection, and backing up of data.
<b>Destruction</b>	The erasure, destruction, or anonymization of personal data.
<b>Law/LPPD</b>	Law No. 6698 on the Protection of Personal Data.
<b>Recording Medium</b>	Any or all settings in which personal data are found that have been processed entirely or partially by automatic means or by non-automatic means, on the condition that it is part of any kind of record system.
<b>Personal Data</b>	all the information relating to an identified or identifiable natural person,
<b>Processing of Personal Data</b>	any operation performed upon personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable, classification or preventing the use thereof, fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means,
<b>Anonymization of Personal Data</b>	rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data,
<b>Erasure of Personal Data</b>	The erasure of personal data is making personal data inaccessible and non-reusable in any capacity for the Relevant Users.
<b>Destruction of Personal Data</b>	The process of making personal data inaccessible, irretrievable, and non-reusable by any person in any capacity.
<b>Board</b>	The Personal Data Protection Board.
<b>Special Categories of Personal Data</b>	Personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions and security measures, and the biometric and genetic data are deemed to be personal data of special nature.

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Abbreviation	Definition
<b>Periodic Destruction</b>	The process of erasure, destruction, or anonymization to be carried out ex officio with repeating intervals specified in the Procedure for the Storage and Destruction of Personal Data, should the entirety of the conditions for the processing of personal data found in the Law be removed.
<b>Data Processor</b>	The natural or legal person who processes personal data based on the authority granted by and on behalf of the data controller.
<b>Data Subject/Relevant Person</b>	The natural person whose personal data are being processed.
<b>Data Controller</b>	the natural or legal person who determines the purpose and means of processing personal data and is responsible for establishing and managing the data registry system.
<b>Regulation</b>	The Regulation on the Deletion, Destruction, or Anonymization of Personal Data published in the Official Gazette on October 28, 2017.

## 5. PROCEDURES AND PRINCIPLES ON THE PROTECTION OF PERSONAL DATA

### 5.1. GENERAL PRINCIPLES REGARDING ITS PROCESSING

STM processes personal data in accordance with the procedures and principles laid out in the LPPD and other relevant laws. In this framework, all principles below that are found in the LPPD are fully complied with while personal data is being processed by STM.

- **To abide by the law and the rule of good faith:** Pursuant to this principle, STM's procedure for data processing are conducted within the limitations of all applicable legislation, particularly Constitution and LPPD and the rule of good faith.
- **To be accurate and, when necessary, up to date:** The necessary measures are taken so that the personal data processed by STM is accurate and current, and the necessary opportunities are acknowledged to data subjects by

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providing notifications for the purpose of ensuring the data being processed reflects reality.


- **To process for specific, clear, and legitimate purposes:** STM only processes personal data for the legitimate purposes specified clearly and definitively and does not engage in data processing operations apart from these purposes. In this scope, STM only processes personal data in connection with the commercial relationship established with the data subjects and in cases when necessary in this respect.
- **To be connected, limited, and restrained to the purposes for which they are processed:** Data is processed in accordance with the LPPD and other relevant legislation, sufficient for the actualization of the objectives specified according to the data categories, and with restraint and regard to the realization of the objective, and unnecessary processing of personal data is avoided.
- **To preserve for as long as the necessary amount of time for the purpose envisaged in the relevant legislation or for the purpose for which they are processed:** Personal data processed by STM are preserved for the amount of time necessary for the objective envisaged in the relevant legislation or for which they are being processed. In this scope, if there is a period of time envisaged for the storage of data in the relevant legislation, STM complies with this period of time, and if no such period exists, STM preserves the personal data for as long as is necessary for the objectives for which they are being processed. STM does not store data by relying on the existence of the possibility that they may be used in the future.

## 5.2. CONDITIONS FOR THE PROCESSING OF PERSONAL DATA

The conditions for the processing of personal data have been regulated with the LPPD, and personal data is processed by STM in accordance with the conditions in question, specified below.

Apart from the exceptions listed in the Law, STM solely processes personal data by means of procuring the **explicit consent** of the data subjects. Should there exist the situations below, listed in the Law, personal data can be processed **even without the explicit consent** of the data subject.

- it is clearly provided for by the laws;

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- it is mandatory for the protection of life or physical integrity of the person or of any other person who is bodily incapable of giving his consent or whose consent is not deemed legally valid;
- processing of personal data belonging to the parties of a contract, is necessary provided that it is directly related to the conclusion or fulfilment of that contract;
- it is mandatory for the data controller to be able to perform his legal obligations;
- the data concerned is made available to the public by the data subject himself;
- data processing is mandatory for the establishment, exercise or protection of any right;
- it is mandatory for the legitimate interests of the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.


In the processing of personal data of special nature, for which it is believed that its protection in terms of data subjects constitutes more critical importance in various aspects, special sensibility is shown by STM. In this scope, this type of data is not processed without the **explicit consent** of the data subjects, on the condition that sufficient precautions specified by the Board are taken. However, persona data of special nature, apart from data related to health and sexual life, can be processed **without the explicit consent** of the data subjects in situations envisaged in the law. At the same time, data relating to health and sexual life can be processed **without explicit consent** on the condition that sufficient precautions be taken and in cases of the existence of the reasons listed below:

- The protection of public health;
- Preventive medicine;
- Medical diagnosis;
- Conducting treatment and care services;
- Planning and management of financing with health services.

### 5.3. OBJECTIVES FOR THE PROCESSING PERSONAL DATA

Your personal data obtained by STM may be processed to the extent elaborated below and that may be added in the future by obligation to be able to maintain our commercial operations:

- HR operations;
- Inhouse operations:

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- Operations with a legal, technical, or administrative result;
- Strategy, planning, and business partnership/supplier management;
- Planning and execution of corporate communication, business development, strategy development, marketing, CRM (Customer Relations Management) operations and activities;
- The planning and execution of in-house training programs.

The categories specified above are submitted for information purposes, and other categories may be added later by our party so that STM may be able to execute commercial and operational processes in the future. In situations like this, STM will continue to update the specified categories in relevant texts for you in order to be able to quickly provide you with information.


#### 5.4. STORAGE OF PERSONAL INFORMATION

The personal data we obtain is stored securely in a physical or electronic environment for a suitable amount of time for the purpose of being able to fulfill STM's commercial operations. In the scope of the operations in question, the obligations laid out in all relevant legislation, primarily the LPPD, are complied with in regards to the protection of personal data by STM. Pursuant to the relevant legislation, should the objectives for the processing of personal data are expired, the data will be erased, destroyed, or anonymized with different usable techniques<sup>1</sup> ex officio by STM or upon the request of the data subjects by means of the attached data subjects application form, provided that the conditions for which the longer storage of personal data is allowed or required be exceptions. Should personal data be erased by means of the methods in question, these data will be destroyed so as to not be able to be used or returned in any capacity.

However, in situations where the data controller has legitimate benefits, personal data may be stored until the expiration of the statute of limitation stipulated (ten years) in the Law of Obligation even though the purposes for processing and the periods of time specified in the relevant laws are expired, on the condition that the fundamental rights and freedoms of data subjects shouldn't be violated throughout such additional term. Following the expiration of the statute of limitation above,

<sup>1</sup>Physically destroy, permanently delete from software, mask, data derivation, communalization, data shuffling, deletion by expect, etc.



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personal data will be erased, destroyed, or anonymized according to the aforementioned procedure.


## 5.5. TRANSFER OF PERSONAL DATA TO DOMESTIC PARTIES

STM carefully complies with the conditions laid out in the LPPD on matters of the sharing of personal data with third parties, without prejudice to the provisions found in other laws. In this framework, personal data is not transferred to third parties by STM without the explicit consent of the data subjects. However, should there exist any one of the conditions expressed below that are regulated by the LPPD, personal data may be transferred by STM without procuring the explicit consent of the data subjects:

- it is clearly provided for by the laws;
- it is mandatory for the protection of life or physical integrity of the person or of any other person who is bodily incapable of giving his consent or whose consent is not deemed legally valid;
- processing of personal data belonging to the parties of a contract, is necessary provided that it is directly related to the conclusion or fulfilment of that contract;
- it is mandatory for the data controller to be able to perform his legal obligations;
- the data concerned is made available to the public by the data subject himself;
- data processing is mandatory for the establishment, exercise or protection of any right;
- it is mandatory for the legitimate interests of the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

Your personal data may be transferred without procuring explicit consent for purposes such as, in terms of personal data of special nature apart from health and sexual life, it being envisaged in laws; and, in terms of personal data of special nature regarding health and sexual life,

- The protection of public health;
- Preventive medicine;

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- Medical diagnosis;
- Conducting treatment and care services;
- The planning and management of financing with health services.

In the transfer of personal data of special nature, the conditions laid out in the conditions for the processing of these data are complied with.

## 5.6. TRANSFER OF PERSONAL DATA ABROAD


Regarding the transfer of personal data abroad, the **explicit consent** of the data subject is sought out in accordance with article 9 of the LPPD. However, should there exist the conditions for which the processing of personal data has been allowed without the explicit consent of the data subject, including personal data of special nature, personal data may be transferred by STM without the explicit consent of the data subject on the condition that there be sufficient protection in the foreign country to which the personal data will be transferred. If the country to which a transfer will be made has not been specified among the countries whose protection has been found to be adequate by the Board, STM and the data controller/data processor in the relevant country will commit in writing to adequate protection.

You can access the groups of people to whom your personal data has been/will be shared from the *list of the groups of people to whom personal data is shared* found in Article 12 of this Policy. However, we would like to note that the indicated lists are for the purposes of providing you with information and will be updated by STM should there be any changes.

## 5.7. STM'S OBLIGATION FOR CLARIFICATION

In the scope of article 10 of the LPPD, data subjects must be notified before their personal data is obtained or at the latest during their acquisition. The information that must be forwarded to data subjects within the framework of the obligations for clarification in question are as follows:

- a) the identity of the data controller and of his representative, if any,
- b) the purpose of data processing;
- c) to whom and for what purposes the processed data may be transferred,
- ç) the method and legal reason of collection of personal data,

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d) other rights referred to in Article 11<sup>2</sup>


STM prepared declarations of clarification to be presented to data subjects in the scope of the provisions of LPPD specified above, on the basis of people whose processes and data have been processed, for the purpose to fulfill the obligations of clarification. After declarations of clarification are presented to data subjects, declarations of explicit consent are also prepared for the data categories and for the data processing operations that require the explicit consent of the data subjects for STM to be able to conduct its commercial operations. In the declarations of explicit consent prepared for the data subjects, in parallel with the European Union regulations constituted based on the LPPD, data subjects have the right to choose whether their personal data can be processed by STM, and should explicit consent be unable to be procured, are to be informed of the results that may occur.

On the other hand, in the framework of article 28(1) of the LPPD, the STM has no obligation for clarification in the situations listed below:

- personal data is processed by natural persons within the scope of purely personal activities of the data subject or of family members living together with him in the same dwelling provided that it is not to be disclosed to third parties and the obligations about data security is to be complied with.
- personal data is processed for the purpose of official statistics and for research, planning and statistical purposes after having been anonymized.
- personal data is processed with artistic, historical, literary or scientific purposes, or within the scope of freedom of expression provided that national defence, national security, public security, public order, economic security, right to privacy or personal rights are not violated or they are processed so as not to constitute a crime.
- personal data is processed within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations duly authorised and

<sup>2</sup> Each person has the right to apply to the data controller and

- a) to learn whether his personal data are processed or not,
- b) to request information if his personal data are processed,
- c) to learn the purpose of his data processing and whether this data is used for intended purposes,
- ç) to know the third parties to whom his personal data is transferred at home or abroad,
- d) to request the rectification of the incomplete or inaccurate data, if any,
- e) to request the erasure or destruction of his personal data under the conditions laid down in Article 7,
- f) to request notification of the operations carried out in compliance with subparagraphs (d) and (e) to third parties to whom his personal data has been transferred,
- g) to object to the processing, exclusively by automatic means, of his personal data, which leads to an unfavourable consequence for the data subject,
- ğ) to request compensation for the damage arising from the unlawful processing of his personal data.

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assigned to maintain national defence, national security, public security, public order or economic security.

- personal data is processed by judicial authorities or execution authorities with regard to investigation, prosecution, criminal proceedings or execution proceedings.  
In addition to this, in the framework of article 28(2) of the LPPD, STM's obligation for clarification will have no space for implementation in the following cases:
  - is required for the prevention of a crime or crime investigation.
  - is carried out on the data which is made public by the data subject himself.
  - is required for inspection or regulatory duties and disciplinary investigation and prosecution to be carried out by the public institutions and organizations and by professional associations having the status of public institution, assigned and authorised for such actions, in accordance with the power conferred on them by the law,
  - is required for protection of State's economic and financial interests with regard to budgetary, tax-related and financial issues.

## 5.8. RIGHTS OF DATA SUBJECTS

With regard to the personal data processed in accordance with the principles found in this Policy, STM has taken the necessary measures on the subject of the use of the rights granted to data subjects in article 11 of the LPPD. The mentioned rights are as follows:

- a) to learn whether his personal data are processed or not,
- b) to request information if his personal data are processed,
- c) to learn the purpose of his data processing and whether this data is used for intended purposes,
- ç) to know the third parties to whom his personal data is transferred at home or abroad,
- d) to request the rectification of the incomplete or inaccurate data, if any,
- e) to request the erasure or destruction of his personal data under the conditions laid down in Article 7,
- f) to request notification of the operations carried out in compliance with subparagraphs (d) and (e) to third parties to whom his personal data has been transferred,

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- g) to object to the processing, exclusively by automatic means, of his personal data, which leads to an unfavourable consequence for the data subject,
- ğ) to request compensation for the damage arising from the unlawful processing of his personal data.

Data subjects may use their rights listed above by forwarding an originally signed copy of the data subject application form found in attachment no. 1 of this Policy, by means of mail, email, or registered letter with advice of receipt to the STM contact addresses. Detailed information regarding the filling out or sending to STM of the form is found in the application form found in attachment no. 1. STM will send responses to the relevant applications to the relevant data subjects physically or electronically.

STM will conclude the request as soon as possible and in no later than thirty (30) days free of charge based on the characteristics of the request. However, should the process require an additional cost, STM will collect the fee from the relevant individuals at the rate specified by the Council. Additionally, in the process of concluding the requests of data subjects, additional information or documentation may be requested from the applicants by STM.

On the other hand, within the framework of article 28(1) of the LPPD, data subjects cannot use the aforementioned rights listed in article 11 of the LPPD in the situations listed below:

- personal data is processed by natural persons within the scope of purely personal activities of the data subject or of family members living together with him in the same dwelling provided that it is not to be disclosed to third parties and the obligations about data security is to be complied with.
- personal data is processed for the purpose of official statistics and for research, planning and statistical purposes after having been anonymized.
- personal data is processed with artistic, historical, literary or scientific purposes, or within the scope of freedom of expression provided that national defence, national security, public security, public order, economic security, right to privacy or personal rights are not violated or they are processed so as not to constitute a crime.
- personal data is processed within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations duly

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authorised and assigned to maintain national defence, national security, public security, public order or economic security.

- personal data is processed by judicial authorities or execution authorities with regard to investigation, prosecution, criminal proceedings or execution proceedings.

However, in the framework of article 28(2) of the LPPD, excluding the right to eliminate damage, the aforementioned rights listed in article 11 of the LPPD will not have areas of implementation in the following situations:

- is required for the prevention of a crime or crime investigation.
- is carried out on the data which is made public by the data subject himself.
- is required for inspection or regulatory duties and disciplinary investigation and prosecution to be carried out by the public institutions and organizations and by professional associations having the status of public institution, assigned and authorised for such actions, in accordance with the power conferred on them by the law,
- is required for protection of State's economic and financial interests with regard to budgetary, tax-related and financial issues.


## 5.9. MEASURES TAKEN FOR DATA SECURITY

STM has the "TSE TS-ISO-IEC- 27001:2013 Information Security Management System Certificate" and, pursuant to the Physical and Environmental Security procedures defined in the scope of this certificate, takes the necessary technical and administrative measures to obtain the suitable level of security necessary for the protection of personal data with data record environments. The measures envisaged in article 12(1) of the LPPD are as follows:

- To prevent the unlawful processing of personal data;
- To prevent the unlawful access of personal data;
- To ensure the preservation of personal data.

The measures that STM has taken in this scope are listed below:

### 5.9.1. Administrative Measures

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- STM conducts and has conducted necessary supervision for the purpose of ensuring the implementation of the provisions of the Law in its own organizations and institutions.
- STM notifies as soon as possible the data subject and Board should personal data be obtained by unlawful means by other parties.
- STM ensures data security with framework agreement signatures with the people with whom personal data is shared or with the provisions it will add to agreements with regard to the sharing of personal data.
- STM employs experienced personnel, knowledgeable about processing personal data, and provides the necessary training on protection of personal data to its personnel.

#### 5.9.2. Technical Measures

- STM employs experienced and knowledgeable personnel and provides the necessary training on protection of personal data to its personnel for the purpose of ensuring data security.
- STM conducts the necessary internal checks in the scope of the established systems.
- STM executes the processes for risk analyses, data classification, IT risk evaluation, and realization of business impact analyses in the scope of the established systems.
- STM ensures that the technical infrastructure that will prevent and/or observe the external leak of personal data is procured and the relevant matrices are created.
- STM ensures that the authority to access personal data by employees is taken under control in information technologies units.

#### 5.10. PROCESSING OF VISUAL RECORDS

In accordance with the fundamental principles envisaged in the LPPD and provided in this Policy, STM takes a visual recording of visitors, employees, and other relevant persons and securely stores these records in a physical or electronic environment for the duration suitable for the objectives of processing, for the purpose of being able to procure the general and commercial security of the Company facilities and businesses (see article “5.4.”).

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Warnings are visibly made regarding the acquisition of visual imagery for the purpose of providing information to data subjects where visual imagery is recorded. In the scope of the operations in question, STM acts in accordance with the obligations laid out in all relevant legislations, primarily the LPPD, with regard to the protection of personal data. Imaging is not taken in places where privacy is high.

## 6. OTHER MATTERS

Should there be a dispute between the provisions of the LPPD and other relevant legislation and this Policy, the provisions of the LPPD and other relevant legislation will be primarily implemented.

Should there be any changes in the Policy, the date of effect and relevant articles will be updated in this respect. The update table is found in the “Document Tag Record”.

## 7. SPECIAL SITUATIONS and EXCEPTIONS

None.

## 8. REVISION AND ANNULMENT

This Policy is reviewed and updated by the relevant STM Legal Counsel once per year.

## 9. EFFECT

This Policy prepared by STM entered in force on the date of 30.03.2018.


## 10. EXECUTION

The responsibility for enforcing the document resides with the STM Legal Consultation.

## 11. DISTRIBUTION

The Policy shall be announced to third parties and Company employees by being published on the STM website and Company intranet.



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## 12. LIST OF GROUPS OF PEOPLE WITH WHOM PERSONAL DATA ARE SHARED

- Financial Companies
- Insurance and Mediation Services Companies
- Courier Companies
- Education Institutions
- Company Authorities
- Legally Authorized Public Offices and Institutions

## 13. DOCUMENT TAG RECORD

Date	Revision No	Change	Prepared By
30.03.2018	RO	First publication.	Legal Consultation