



GALATA WIND ENERJİ A.Ş.
POLICY ON PROTECTION AND PROCESSING
OF PERSONAL DATA

1. PURPOSE

As Galata Wind Enerji Anonim Şirketi ("Galata Wind"); processing personal data of natural persons including our employees, employee candidates, interns, intern candidates, visitors, online visitors, supplier officials, supplier employees, subcontractor employees, shareholders / partners, members of the board of directors, product or service buyers and potential product or service buyers in accordance with relevant legislation particularly Constitution of Republic of Turkey and international conventions on human rights to which our country is a party and Law No. 6698 on the Protection of Personal Data ("LPPD" or "the Law") and ensuring the effective use of the rights of the relevant people whose data is processed is our priority.

Therefore, but not limited to those listed; The processing, storage and transfer of data regarding our employees, visitors, business contacts, business partners, customers, users visiting our website, in short, all personal data we obtain during our activities, are in accordance with the Galata Wind Personal Data Protection and Processing Policy ("Policy"). we are doing.

The protection of personal data and the protection of fundamental rights and freedoms of natural persons whose personal data are collected is the basic principle of our policy on the processing of personal data. For this reason, we carry out all activities in which personal data are processed by protecting the privacy, confidentiality of communication, freedom of thought and belief and the right to use effective legal remedies.

We take all administrative and technical protection measures required by the nature of the data in accordance with the legislation and current technology for the protection of personal data and keep the measures up to date.

This Policy describes the methods we follow to process (eg, store, transfer and delete or anonymize) personal data collected during our activities in accordance with the principles set out in the LPPD.

2. SCOPE

This Policy applies to all personal data of natural persons including but not limited to our employees, employee candidates, interns, intern candidates, visitors, online visitors, supplier officials, supplier employees, subcontractor employees, shareholders / partners, members of the board of directors, product or service buyers and potential product or service buyers subject to data processing by Galata Wind.

Our policy applies to all processing activities related to personal data within Galata Wind and has been dealt with and prepared in accordance with LPPD and other legislation on personal data and international standards in this field.



3. DEFINITIONS AND ABBREVIATIONS

Within the scope of this Policy;

- 3.1. **Galata Wind:** Galata Wind Enerji Anonim Şirketi
- 3.2. **Explicit Consent:** Approval to a specific issue, which is based on information and free will, without any hesitation, given only limited to that process.
- 3.3. **Anonymization:** Making personal data unable to match in no way with a known or identifiable natural person, even if matched with other data.
- 3.4. **Employee:** Galata Wind personnel.
- 3.5. **Relevant person:** Real person whose personal data is processed.
- 3.6. **Personal Data:** Any information about an identified or identifiable natural person.
- 3.7. **Sensitive Personal Data:** Biometrics and genetics of people and their data on race, ethnic origin, political thought, philosophical belief, religion, sect, or other beliefs, appearance and dress, association, foundation or union membership, health, sexual life, criminal conviction, and security measures datas.
- 3.8. **Processing of personal data:** Any process performed on the data such as obtaining personal data in whole or in part by automatic or non-automatic means provided that it is part of any data recording system, saving, storing, keeping, modifying, rearrangement, disclosure, transfer, takeover, making available, classifying or preventing its use.
- 3.9. **Data Processor:** Natural or legal person who processes personal data based on the authority granted by and on behalf of the data control.
- 3.10. **Data Controller:** Natural or legal person who determines the purposes and means of the processing of personal data, and who is responsible for establishment and management of the data recording system.
- 3.11. **PPD Board:** Protection of Personal Data Board.
- 3.12. **PPD Authority:** Protection of Personal Data Authority.
- 3.13. **LPPD or Law:** Law No. 29677 dated 7 April 2016 published in the Official Gazette Law on the Protection of Personal Data
- 3.14. **REA:** It is a registered e-mail address. It is a system that protects all kinds of commercial, legal correspondence and document sharing in the sent form, determines exactly who the recipient is, ensures that the content does not change, and turns the content into legal, valid and secure, definitive evidence.
- 3.15. **Policy:** Galata Wind Protection and Processing Policy of Personal Data.



4. ROLES AND RESPONSIBILITIES

4.1. Board of Directors

The Board of Directors is responsible for the oversight of the determination and operation of notification, review and sanction mechanisms in case of non-compliance with the Policy, rules and regulations.

4.2. Executive Board

The Personal Data Protection and Processing Policy has been approved by the Executive Board. It is the authorized approval mechanism for the creation, implementation and, if necessary, updating of the Policy.

Activities for which the Executive Board is responsible:

- Taking the necessary measures for the compliance of the foreign service companies with the Policy, together with the employees,

4.3. Legal Office Department

The Information Systems Department and the Legal Office Department are responsible for the preparation, development, execution and updating of this Policy. The Legal Office Department evaluates this Policy in terms of its up-to-dateness and development needs when necessary.

It is the responsibility of the Galata Wind Legal Office Department to distribute the prepared document within the company.

4.4. Information Systems Department

The Information Systems Department is responsible for the preparation, development, execution and updating of this Policy, together with the Legal Office Department. It evaluates this Policy in terms of timeliness and development needs when necessary.

It is the responsibility of Galata Wind Information Systems Department Manager to publish the prepared document on the corporate portal.

4.5. Investor Relations Department

Within the framework of this Policy, the Investor Relations Department is responsible for regulating Galata Wind's relations between institutional investors, portfolio managers, analysts, current and potential shareholders and making public disclosure practices transparently and simultaneously to all concerned. It is the responsibility of the Galata Wind Investor Relations Department Manager to publish the prepared document on the website.



5. LEGAL OBLIGATIONS

As the data controller, our legal obligations for the protection and processing of personal data are as follows:

5.1. Disclosure Obligation

When collecting personal data as data controller;

- The purpose for which personal data shall be processed
- Information regarding our trade name
- To whom and for what purpose the processed personal data may be transferred,
- The way we collect data and the legal reason,
- Rights arising from LPPD,

are the issues that we are obliged to inform the relevant Person.

As Galata Wind, we pay attention to make sure that this Policy, which is open to the public, is understandable and easily accessible.

5.2. Our Obligation to Ensure Data Security

As data controller, we take the administrative and technical measures stipulated in the legislation in order to ensure the security of the personal data we process. Obligations and measures regarding data security are explained in detail in part 9 of this Policy.

6. CLASSIFICATION OF PERSONAL DATA

6.1. Personal Data

Personal data are any information about an identified or identifiable natural person.

The protection of personal data is only about natural persons and the information of legal persons that does not contain any information about natural person is excluded from personal data protection. Therefore, this Policy does not apply to data of legal persons.

6.2. Sensitive Personal Data

Biometrics and genetics data of people and their data on race, ethnic origin, political thought, philosophical belief, religion, sect, or other beliefs, appearance and dress, association, foundation or union membership, health, sexual life, criminal conviction, and security measures data are sensitive personal data.



7. PERSONAL DATA PROCESSING

7.1. Personal Data Processing Principles

We process personal data in accordance with the following principles.

7.1.1. Processing in accordance with the law and good faith

We process personal data in accordance with good faith, transparent methods and by fulfilling our obligation of disclosure.

7.1.2. Ensuring that personal data is accurate and up-to-date when necessary

We take the necessary administrative and technical measures in our data processing activities to ensure that the processed data is accurate and up-to-date. However, since a significant portion of the data is processed on the basis of the Declaration of the Relevant People, we reflect these declarations in the most accurate manner and we offer to the People the opportunity to apply to update their data and correct any errors.

7.1.3. Processing for specific, clear and legitimate purpose

As Galata, we process personal data which is clearly defined in scope and content, to continue our activities in accordance with the legislation and within the framework of the ordinary course of life in line with our legitimate aims.

7.1.4. Of personal data being linked, limited and proportionate with processed aim

We process personal data in connection with our purposes, limited and proportionate.

We avoid the processing of personal data that is not relevant or does not need to be processed. For this reason, we do not process sensitive personal data unless there is a legal obligation to do so, and we obtain explicit consent when we need to process.

7.1.5. Storing personal data for a period of time as in statutory regulations or required by our legitimate interest

Many regulations in the legislation require that personal data should be stored for a certain period of time. For this reason, we store the personal data we process taking into consideration the time periods required by the relevant legislation or for the purposes for which the personal data are processed.

In the event that the storage period stipulated in the legislation expires or the purpose of processing disappears, we delete, destroy or anonymize personal data. Our principles and procedures regarding retention periods are detailed in section 9 of this Policy.



7.2. Purposes of Personal Data Processing

As Galata Wind, we process personal data for purposes similar to those listed below, including but not limited to:

- Execution of our activities,
- To provide support services to customers within the scope of the contract and within the framework of service standards,
- Determining the preferences and needs of our customers and shaping and updating the services to be provided to our customers within this scope,
- To ensure that our legal obligations are fulfilled as required or required by legal regulations,
- To be able to do market research and statistical studies
- Surveys, competitions, promotions and sponsorships,
- Evaluating job applications,
- To contact people who have business relations with Galata Wind,
- Marketing,
- Compliance management,
- Vendor / supplier management,
- Advertising,
- Legal reporting,
- Billing.

7.3. Legal Reason for the Collection of Sensitive Personal Data

Sensitive personal data are processed by us by taking the administrative and technical measures envisaged by the laws and by the PPD Board, if there is express consent, or when required by the legislation.

Since sensitive personal data related to health and sexual life can be processed by persons or authorized institutions and organizations under the obligation of keeping confidentiality, for the purpose of protecting public health, performing preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, It is not processed by us other than the data of our employees. Such data belonging to our employees may be processed by the persons stipulated by the law.

7.4. Exceptional cases where express consent is not sought in the processing of personal data

In exceptional cases listed below and arising from the law, we may process personal data without express consent:



- It is expressly provided for by the laws;
- Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract;
- It is necessary for compliance with a legal obligation to which the data controller is subject;
- Data processing is necessary for the establishment, exercise or protection of any right;
- Processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

Exceptional cases where sensitive personal data can be processed without the explicit consent of the Relevant Person are specified in article 7.3 of this Policy.

8. PERSONAL DATA TRANSFER

8.1. Transfer of Personal Data within the Country

As Galata Wind, we act in accordance with the regulations stipulated in the LPPD and the decisions taken by the PPD Board regarding the transfer of personal data.

Without prejudice to the exceptional circumstances in the legislation, personal data and sensitive data are not transferred by us to other real persons or legal entities without the explicit consent of the Relevant Person.

In exceptional cases stipulated by the Law and other legislation, the data may be transferred to the authorized administrative or judicial institution or organization, without the explicit consent of the Relevant Person, in the manner stipulated in the legislation and within the limits.

In addition, personal data can be transferred without seeking explicit consent, with exceptional circumstances stipulated by the legislation;

- In the cases described in article 7.4. of the Policy,
- In the cases listed in the article 7.3 of the Policy with regard to sensitive personal data,
- Sensitive personal data related to the health and sexual life of the Relevant Person can only be protected, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, together with the measures stipulated by the PPD Board and the relevant legislation. persons or authorized institutions and organizations that are under the obligation to keep secrets.



8.2. Transfer of Personal Data Abroad

As a rule, personal data cannot be transferred abroad without the explicit consent of the Relevant Person. However, in the existence of one of the reasons for compliance with the law in this Policy and if the third person whose data is subjected to be transferred abroad:

- Is resident in one of the countries considered safe by the PPD Board;
- Is not resident in one of the countries considered safe by the PPD Board but the data controllers in Galata Wind and in the insecure country undertake adequate protection in writing and the PPD Board authorizes to transfer to the relevant country;

personal data may be transferred abroad without explicit consent.

8.3. Institutions and organizations to which personal data is transferred

Personal data may be transferred to, including but not limited to;

- Suppliers,
- Our business partners and business contacts,
- Our affiliates and group companies,
- Legally authorized public institutions and organizations,
- Legally authorized private legal persons,
- Our shareholders,

according to the principles and rules described above.

8.4. Measures We Have Taken to Ensure the Transfer of Personal Data in Accordance with the Law

8.4.1. Technical measures

We take various measures to protect personal data, including, but not limited to, the followings. In this context;

- We make technical organization within Galata Wind for processing and storing personal data in accordance with the legislation,
- We establish the necessary technical infrastructure to ensure the security of the databases where your personal data will be stored,
- We monitor and audit the processes of the technical infrastructure,



- We determine the procedures for reporting our technical measures and audit processes,
- We periodically update and renew technical measures,
- We produce the necessary technological solutions by re-examining risky situations,
- We use virus protection systems, firewalls and similar software or hardware security products and install security systems proper to the technological developments,
- We employ experts in technical matters.

8.4.2. Administrative Measures

We take various measures to protect personal data, including, but not limited to, the followings. In this context;

- We establish policies and procedures for access to personal data, including employees of Galata Wind,
- We inform and train our employees about the legal protection and processing of personal data
- We record the measures to be taken in case of unlawful processing of personal data by our employees in the contracts we make with our employees and / or policies.
- Concluding confidentiality agreements with employees,
- We audit the processing of personal data of the data processors or partners of the data processors with whom we work.

9. STORAGE OF PERSONAL DATA

9.1. Storage of Personal Data for the time required by the legislation or required for the purpose for which it is processed

We store personal data for as long as required by the purpose of processing personal data, without prejudice to the storage periods stipulated in the legislation.

In cases where we process personal data for more than one purpose, the data is deleted, destructed or stored by anonymizing if there is no obstacle in the legislation for the deletion of the data or if requested by the relevant person. The provisions of the legislation and the resolutions of the PPD Board shall be complied with in respect of destruction, deletion or anonymization.

9.2. Measures we take about storing personal data

9.2.1. Technical measures

- We establish technical infrastructure and control mechanisms for the process of deletion, destruction or anonymization of personal data,



- We take the necessary measures for the safe storage of personal data,
- We employ employees with technical expertise
- We make business continuity and emergency plans against possible risks and develop systems for their implementation
- We set up security systems in accordance with technological advances in the storage of personal data.

9.2.2. Administrative measures

- We raise awareness by informing our employees about technical and administrative risks related to the storage of personal data,
- In the case of cooperation with third parties for the storage of personal data, in the agreements with the companies to which the personal data are transferred, we set provisions for the necessary security measures to protect and safeguard the transferred personal data.

10. SECURITY OF PERSONAL DATA

10.1. Our Obligations Regarding Personal Data Security

As Galata Wind; We take administrative and technical measures according to technological possibilities and implementation costs;

- To prevent unlawful processing of personal data,
- To Prevent unlawful access to personal data,
- To ensure that personal data is stored in accordance with the law.

10.2. Measures We Take To Prevent Unlawful Processing Of Personal Data

- We conduct and have the necessary audits performed within Galata Wind,
- We train and inform our employees about the legal processing of personal data
- The activities carried out by Galata Wind are evaluated in detail for all business units, and as a result of the said evaluation, personal data is processed specifically for the commercial activities carried out by the relevant units,
- In contracts concluded with companies that process personal data, in cases where cooperation is made with third parties for the purpose of processing personal data; It includes provisions regarding the taking of necessary security measures by the persons who process personal data,
- In the event of unlawful disclosure of personal data or data leakage, we notify the Person and the PPD Board about the situation and carry out the examinations stipulated by the legislation and take the necessary measures.



10.2.1. Technical and administrative measures taken to prevent unlawful access to personal data

To prevent unlawful access to personal data;

- We employ employees with technical expertise,
- We periodically update and renew technical measures,
- We set access authorization procedures within the company,
- We determine the procedures for reporting our technical measures and audit processes,
- We establish the data recording systems used in the company in accordance with the legislation and audit periodically,
- We make emergency aid plans against possible risks and develop systems for the implementation of them,
- We train and inform our employees about access to personal data and authorization,
- In the cases where cooperation with third parties is made for the processing of personal data, we set provisions for taking the necessary security measures in the agreements with the companies to take necessary security measures by people accessing to personal data,
- We set up security systems within technological advances to prevent unlawful access to personal data.

10.2.2. Measures we take in case of unlawful disclosure of personal data

We take administrative and technical measures to prevent unlawful disclosure of personal data and update them in accordance with our relevant procedures. We set up the necessary systems and infrastructures to notify the relevant Person and the PPD Board, in case of detecting unauthorized disclosure of personal data.

In case of an unlawful disclosure despite all the administrative and technical measures, this may be announced on the website of the PPD Board or by other means if deemed necessary by the PPD Board.

11. RIGHTS OF RELEVANT PERSON

Within the scope of our disclosure obligation, we inform the Relevant Person and establish necessary systems and infrastructures for this information. We make the necessary technical and administrative arrangements for the Relevant Person to exercise his / her rights regarding his / her personal data.

The relevant person has the following rights with respect to his personal data:



- To learn whether his/her personal data were processed or not,
- If their personal data were processed, to request information about it,
- To learn the purpose of processing your personal data and whether this data was used for intended purposes,
- To know the third parties to whom their personal data were transferred at home or abroad,
- To request the rectification of the incomplete or inaccurate data, if any,
- To request the deletion or destruction of personal data in the event that the reasons for the processing of personal data are terminated,
- To request that the above mentioned correction, deletion or destruction be notified to the third parties to whom the personal data have been transferred,
- Object to occurrence of any result that is to her/his detriment by means of analysis of personal data exclusively through automated systems,
- To request compensation for the damage arising from the unlawful processing of the personal data.

11.1. Exercise of rights regarding personal data

As Relevant Person, you can submit your request regarding your personal data to our Company using this method or in accordance with the Communiqué on Application Procedures and Principles to the Data Controller, if a separate method is determined by the PPD Board. You can also direct your applications to us by sending them to the address “Burhaniye Mahallesi, Kısıklı Caddesi, No: 65, Üsküdar/Istanbul” and by sending them to the registered e-mail address of galatawind@hs02.kep.tr.

In the application containing the explanations regarding the right to be made and requested by the Relevant Person to use the above-mentioned rights; The requested matter must be clear and understandable, the requested matter must be related to the applicant's person or, if acting on behalf of someone else, he must be specifically authorized in this regard and this authority must be documented, the application must include identity and address information, and documents proving his identity must be attached to the application.

Such requests will be made individually and requests made by unauthorized third parties regarding personal data will not be taken into consideration.

11.2. Evaluation of the Application

11.2.1. Response time of the application

Requests regarding personal data are concluded as soon as possible, and in any case within 30 (thirty) days at the latest, free of charge, or against the fee in the tariff if the conditions in the tariff to be published by the PPD Board are met.

Additional information and documents may be requested during the application or while the application is being evaluated.



11.2.2. Our right to reject the application

Applications about personal data may be rejected including but not limited to the following conditions;

- Processing of personal data for purposes such as research, planning and statistics by making anonymous with official statistics
- Processing of personal data for art, history, literature or scientific purposes or within the scope of freedom of expression provided that it does not violate the right of privacy or personal rights of the Relevant Person or constitute a crime,
- Processing of personal data publicized by the Relevant Person,
- Unjustified application,
- The application contains a request contrary to the relevant legislation,
- Failure to follow the application procedure.

11.3. Evaluation Procedure of the Application

For the response time specified in article 11.2.1. of this Policy to start, applications must be delivered by hand or by a notary public in writing and wet signed or must be sent via REA with electronic signature or by using the e-mail address previously notified to the data controller by the Relevant Person and registered in the system of the data controller.

If the request is accepted, the necessary procedures are applied and the applicant is notified in writing or electronically. If the request is rejected, the justification is explained and notified to the applicant in writing or electronically.

11.4. Right to Complain to the Personal Data Protection Board

In cases where the application is rejected, the answer we give is insufficient or the answer is not given on time; The applicant has the right to lodge a complaint with the PPD Board within 30 (thirty) days from the date of learning the answer and in any case within 60 (sixty) days from the date of application.

12. PUBLISHING AND STORAGE OF THE POLICY

This Policy can be stored in two different media, in paper or electronic form. The updated version of the documents is available on the institution portal and website.

Wet signed or electronic signed copies are kept in Galata Wind Financial Affairs Unit and controlled copies are kept in Galata Wind Legal Unit and destroyed by Galata Wind Legal Unit with the written approval of Information Systems Department Manager when necessary.



13. UPDATE FREQUENCY

This Policy is reviewed at least once a year and updated, if necessary, in line with the principles set in the Documentation Management Procedure.

14. ENFORCEMENT

This policy enters into force on the date of acceptance by the Executive Board.

15. ABOLITION OF THE POLICY

This Policy will enter into force as soon as it is published by Galata Wind. If it is decided to repeal this Policy, if there is a copy of the Policy with wet signature, it is canceled and signed by the Galata Wind Legal Unit with the written approval of the Information Systems Department Manager (with the cancellation stamp or by writing cancellation) and for a period of 5 years. It is kept by the Financial Affairs Unit.