

**ZORLU ENERJİ ELEKTRİK ÜRETİM A.Ş.**  
**POLICY ON THE PROTECTION AND**  
**PROCESSING OF PERSONAL DATA**

## TABLE OF CONTENTS

1.	SECTION 1- INTRODUCTION .....	2
1.1.	INTRODUCTION .....	2
1.2.	SCOPE .....	2
1.3.	APPLICATION OF THE POLICY AND RELEVANT LEGISLATION .....	2
1.4.	ENFORCEMENT OF THE POLICY .....	2
2.	SECTION 2 - ISSUES RELATED TO THE PROTECTION OF PERSONAL DATA .....	3
2.1.	ENSURING THE SECURITY OF PERSONAL DATA .....	3
2.2.	PROTECTION OF SENSITIVE PERSONAL DATA .....	3
2.3.	INCREASING THE AWARENESS AND SUPERVISION OF THE BUSINESS UNITS ABOUT THE PROTECTION AND PROCESSING OF PERSONAL DATA .....	3
3.	SECTION 3- ISSUES RELATED TO PROCESSING OF PERSONAL DATA .....	4
3.1.	PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH THE PRINCIPLES SET FORTH IN THE LEGISLATION .....	4
3.2.	CONDITIONS FOR PROCESSING PERSONAL DATA .....	5
3.3.	PROCESSING OF PERSONAL DATA OF SENSITIVE NATURE .....	6
3.4.	PERSONAL DATA PROCESSED BY OUR COMPANY .....	6
3.5.	PURPOSE OF PROCESSING PERSONAL DATA .....	7
3.6.	DISCLOSURE TO THE PERSONAL DATA SUBJECT .....	9
3.7.	TRANSFER OF PERSONAL DATA .....	9
4.	SECTION 4 - STORAGE AND DESTRUCTION OF PERSONAL DATA .....	12
5.	SECTION 5 - RIGHTS OF PERSONAL DATA SUBJECTS AND EXERCISING THESE RIGHTS .....	12
5.1.	RIGHTS HELD BY THE DATA SUBJECT .....	12
5.2.	EXERCISING THE RIGHTS HELD BY THE DATA SUBJECT .....	13
5.3.	OUR COMPANY'S RESPONSE TO REQUESTS .....	13

## **1. SECTION 1- INTRODUCTION**

### **1.1. INTRODUCTION**

Protection of personal data is among the top priorities of Zorlu Enerji Elektrik Üretim Anonim Şirketi ("**Company**"). The principles adopted in the processing of personal data carried out by our Company pursuant to the Zorlu Enerji Elektrik Üretim Anonim Şirketi Policy on the Protection and Processing of Personal Data ("**Policy**") and the basic principles adopted with respect to our Company's data processing activities being in compliance with the arrangements in the Law on the Protection and Processing of Personal Data No. 6698 (the "**Law**") are explained, and thus our Company provides the required transparency by means of informing the personal data subjects. With the full awareness of our responsibility in this context, your personal data will be processed and protected within the scope of this Policy.

### **1.2. SCOPE**

This Policy relates to all personal data of the persons whose personal data are processed by our Company, except for the employees of our Company, which are processed by automated or non-automated means, provided that they are part of any data recording system.

### **1.3. APPLICATION OF THE POLICY AND RELEVANT LEGISLATION**

The relevant legal regulations in force for the processing and protection of personal data shall primarily apply. If there is a discrepancy between the legislation in force and the Policy, our Company accepts that the legislation in force shall apply. The Policy regulates the rules laid down by the relevant legislation in the context of our Company's practices by means of materializing the same.

### **1.4. ENFORCEMENT OF THE POLICY**

This Policy, set out by our Company, entered into force on date 23.09.2024. In the case of renewal of the whole Policy or its certain clauses, the enforcement date of the Policy will be updated accordingly. The policy shall be published on our Company's website ([zorluenerji.com.tr/en](http://zorluenerji.com.tr/en)) and made available to the access of the relevant persons upon request of the personal data subjects and updated when required.

## **2. SECTION 2 - ISSUES RELATED TO THE PROTECTION OF PERSONAL DATA**

### **2.1. ENSURING THE SECURITY OF PERSONAL DATA**

In accordance with Article 12 of the Law, our Company takes the measures required by the nature of the data to be protected to prevent unlawful disclosure, access, transfer, or security deficiencies that may occur in different forms. In this context, our Company's Personal Data Protection Board (the "**Board**") takes administrative measures to ensure the required level of security in accordance with the guidelines published by the Company, performs inspections, or has them done accordingly.

### **2.2. PROTECTION OF SENSITIVE PERSONAL DATA**

Sensitive personal data has been attributed special importance under the Law due to the risk to cause victimization of persons or discrimination when processed illicitly. This data of "sensitive nature" is, related to race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, dress codes, association, foundation or trade union memberships, health, sexual life, criminal conviction and security measures as well as biometric and genetic data.

In this context, the technical and administrative measures taken by our Company for the protection of personal data are carefully applied with regard to special quality personal data and necessary controls are provided within our Company.

### **2.3. INCREASING THE AWARENESS AND SUPERVISION OF THE BUSINESS UNITS ABOUT THE PROTECTION AND PROCESSING OF PERSONAL DATA**

Our company ensures that required trainings are organized for the business units in order to increase the awareness for preventing unauthorized and illicit processing of the personal data and unauthorized access to data contrary to the law and providing the safekeeping of data.

Necessary systems are established to raise the awareness of the Company's existing and newly admitted employees, on the protection of personal data, and consultants are engaged related to the subject matter when required. In this regard, our Company evaluates attendance at relevant training courses, seminars, and briefings and provides new training whenever the relevant legislation is updated.

### **3. SECTION 3- ISSUES RELATED TO PROCESSING OF PERSONAL DATA**

#### **3.1. PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH THE PRINCIPLES SET FORTH IN THE LEGISLATION**

##### **3.1.1. Processing in compliance with the Rule of Law and Good Faith**

Personal data will be processed in accordance with the general trust and integrity rule so that people's fundamental rights and freedoms are not prejudiced. In this context, personal data will be processed to the extent required by our Company's business activities and will be limited to them.

##### **3.1.2. Ensuring that Personal Data is Correct and Updated When Required**

While processing personal data, our Company takes the necessary measures to ensure that personal data is accurate and up-to-date, and provides the mechanisms needed to ensure the accuracy and currency of personal data for specific periods of time.

##### **3.1.3. Processing with Specific, Explicit and Legitimate Purposes**

Our Company makes clear the purposes for which it processes personal data and with respect to business activities, and it processes them for the purposes relating to these activities.

##### **3.1.4. Personal Data is linked to, limited and measured with the purpose of being processed**

Personal data will be processed only to the extent required by our Company's business activities, and this will be limited to the stated targets.

##### **3.1.5. Personal data is retained for the time stipulated in the relevant legislation or for the time required regarding the purpose for which it is being processed.**

Our Company retains personal data only for the period specified in the relevant legislation or for the purpose for which such data has been processed. In this context, our Company in the first place determines whether a period has been stipulated for the storage of personal data in the relevant legislation and if a period has been stipulated, then it acts in compliance with this period. If there is no legally prescribed period, personal data will be stored for the period required for the purpose for which they are processed. Personal data will be destroyed at the end of the specified storage periods in accordance with the periodic destruction periods or at the data subject's request and by using the prescribed destruction methods (deletion and/or destruction and/or anonymization).

### **3.2. CONDITIONS FOR PROCESSING PERSONAL DATA**

Apart from the explicit consent of the personal data subject, just as the basis for processing personal data can be only one of the following conditions, so multiple conditions can be the basis for processing that same personal data. In the case the processed data is sensitive personal data, the terms contained under title 3.3 of this Policy ("Processing of Sensitive Personal Data") shall apply.

#### **(i) Explicit Consent of the Personal Data Subject to be Available**

One of the conditions for processing personal data is the explicit consent of the data subject. The explicit consent of the personal data subject must be explained based on a specific subject, on an informative basis and with free will and active affirmative action. The data subject may always withdraw the explicit consent they have given.

Should any of the following personal data processing conditions exist, personal data may be processed without the data subject's explicit consent:

#### **(ii) Clearly prescribed by the law**

If the data subject's personal data is expressly stipulated by law, in other words, if there is an explicit provision regarding the processing of personal data in the relevant law, it may be said that this data processing condition exists.

#### **(iii) Failure to Obtain Explicit Consent of the Person Due to Actual Impossibility**

The personal data of the data subject may be processed if it is compulsory to process the personal data in order to protect the life or bodily integrity of the person himself/herself or of someone else who is not able to explain his/her reason due to the actual impossibility or whose consent cannot be considered as valid.

#### **(iv) Direct Relation with the Establishment or Execution of the Contract**

Provided that it is directly related to the establishment or execution of a contract to which the data subject is a party, this condition may be deemed fulfilled if it is necessary to process personal data.

#### **(v) Performance of the Legal Obligations by the Company**

The data subject's personal data may be processed if processing is compulsory for our company to fulfil its legal obligations.

**(vi) Personal Data Subject Publicizing Personal Data**

If the data subject has publicized his/her personal data, the relevant personal data may be processed in a limited manner for the purpose of such publicization.

**(vii) Data Processing is Compulsory for the Establishment or Protection of a Right**

If data processing is compulsory for the establishment or protection of a right, the data subject's personal data may be processed.

**(viii) Data Processing is Compulsory for the Legitimate Interest of our Company**

The personal data of the data subject may be processed if the data processing is compulsory for our Company's legitimate interests provided that the fundamental rights and freedoms of the personal data subject are not prejudiced.

**3.3. PROCESSING OF PERSONAL DATA OF SENSITIVE NATURE**

Sensitive personal data will be processed by our Company in accordance with the principles specified in this Policy and by taking all necessary administrative and technical measures, including the methods to be determined by the Board under the data processing conditions defined in article 6 of the Law.

**3.4. PERSONAL DATA PROCESSED BY OUR COMPANY**

PERSONAL DATA CATEGORIZATION	PERSONAL DATA CATEGORIZATION DESCRIPTION
<b>Identity Information</b>	This is the data concerning the identity of a person: driving license, identity card and passport and tax ID number containing information such as name-surname, Turkish Republic ID.
<b>Contact Information</b>	Information such as residence, telephone number, address, e-mail, address registration system.
<b>Information on Physical Premises Security</b>	Personal data regarding records and documents received upon entry to the physical space during the stay in the physical space; camera recordings and security-point records, etc.
<b>Financial Information</b>	Personal data processed in relation to information, documents and records showing any financial results.
<b>Legal Procedures and Compliance Information</b>	Personal data processed within the scope of detecting and following up our legal receivables and rights, the discharge of our liabilities,

	and compliance with our legal obligations and our Company's policies.
<b>Transaction Security Information</b>	Personal data (e.g. log records) processed to ensure our technical, administrative, legal and commercial security while conducting our commercial activities.
<b>Visual and Audio Data</b>	Data which explicitly belongs to a real person whose identity is clear or may be determined, photographs and camera recordings, voice recordings and copies of documents containing personal data.
<b>Employee Candidate Information</b>	Personal data processed about the individuals who have been evaluated as prospective employees in line with our Company's human resources requirements or who desire to have a professional relationship with our Company in line with the rules of commercial practice and integrity.
<b>Contract Information</b>	Data about our suppliers or business partners who conduct any business relationship with our company and information about the contracts with these companies or company employees
<b>Sensitive Personal Data</b>	Data related to race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, dress codes, association, foundation or trade union memberships, health, sexual life, criminal conviction and security measures as well as biometric and genetic data of persons are defined as sensitive private data under the Law.

### **3.5. PURPOSE OF PROCESSING PERSONAL DATA**

Our company processes personal data pursuant to the following purposes:

#### ***A) Planning or execution of our Company's human resources policies and processes***

Conducting the process of employee candidate application processes  
Conducting the employee candidate, trainee, student selection and recruitment process

#### ***B) Planning or execution of activities to ensure the legal and technical security of our Company and the persons concerned who conduct business relations with our Company***

Performance of the operational activities required to ensure that the company activities be carried out in accordance with company procedures or the relevant legislation.  
Planning or performance of procedures relating to company and partnership law

Creating or tracking visitor records  
 Conduct and follow-up of legal affairs  
 Providing information to official institutions or organizations within the scope of the obligations arising from the legislation, submitting requested information and documents  
 Ensuring that data is accurate and up to date  
 Performance of Storage and Archive Activities  
 Performance of required operational activities related to disciplinary and ethical processes  
 Ensuring the security of company operations  
 Planning, supervision or enforcement of information security processes  
 Establishment and management of the information technology infrastructure  
 Planning or execution of our company's legal compliance activities  
 Planning and/or execution of identity authentication activities  
 Planning and execution of our company's audit, inspection or control activities  
 Conduct of Emergency Management Processes,  
 Tracking of contract processes or legal requests  
 Ensuring the security of company inventory stocks or resources  
 Planning and/or execution of emergency or event management procedures  
 Ensuring the security of company premises or facilities  
 Planning and/or execution of network monitoring and management activities  
 Execution of debt collection communications or transactions  
 Management of access authorizations  
 Planning and execution of energy permission management processes

***C) Having our relevant business units carry out the work required for the actualization of the commercial activities run by the Company and conducting the associated business processes***

Follow-up of financial or accounting transactions  
 Performance of efficacy, efficiency or on-site analyses of business activities  
 Planning or execution of corporate governance activities  
 Planning or execution of business continuity activities  
 Planning or execution of purchasing processes  
 Planning or execution of internal or external reporting activities  
 Event management  
 Conduct of Contract Processes  
 Planning and execution of supply chain management processes

Receiving and evaluating the suggestions for the improvement of business processes
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***D) Planning or execution of our company's commercial and/or business strategies***

Planning or execution of strategic planning activities
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Performance or execution of budget studies
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Planning and execution of the Company's financial risk procedures
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Performance of risk assessment activities for business partners or suppliers
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### **3.6. DISCLOSURE TO THE PERSONAL DATA SUBJECT**

In accordance with Article 10 of the Law and secondary legislation, our Company in its capacity as the data controller, informs personal data subjects of who is processing their personal data, for what purposes, with whom they are being shared and for what purposes, what methods were used to collect the data, the legal basis, and their rights regarding the processing of their personal data.

### **3.7. TRANSFER OF PERSONAL DATA**

Our company may transfer personal data and personal data of special nature of the personal data subject to third parties by taking the required security measures pursuant to the personal data processing objectives in accordance with the law. In this respect, our Company acts in accordance with the regulations stipulated in Article 8 and 9 of the Law.

#### **3.7.1. Transfer of Personal Data**

Even if the personal data subject has not given his/her explicit consent, if one or more of the following conditions are present, personal data may be transferred to third persons by our Company by taking all due care and all necessary security precautions including those stipulated by the Board:

- Relevant activities related to the transfer of personal data being explicitly stipulated in the law,
- The transfer of personal data by the Company is directly related to and required for the establishment or execution of a contract;
- The transfer of personal data is compulsory for our Company to fulfill its legal obligations;
- The transfer of personal data by our Company in a limited manner for the purpose of making it public, provided that it has been made public by the data subject;

- The transfer of personal data by the Company is mandatory for the establishment, use, or protection of the rights of the Company or the data subject or third parties,
- Personal data transfer activity is mandatory for the legitimate interests of our Company, provided that such transfer does not violate the fundamental rights and freedoms of the data subject,
- The existence of an obligation to protect the life or bodily integrity of the person who cannot explain his/her consent due to actual impossibility or whose consent is not deemed valid in legal terms.

In addition to those listed above, personal data may be transferred to the foreign countries announced to have adequate protection by the Board if any of the conditions in ("**Foreign Countries with Adequate Protection**") are met. In the absence of adequate protection, the conclusion of standard contracts published by the Board between the parties to the transfer, undertaking of data controllers in Türkiye and in the relevant foreign country in writing to provide adequate protection and transfer of data to foreign countries where the Board has given consent "**Foreign Country of the Data Controller Undertaking Adequate Protection**") in line with the data transfer conditions stipulated in the legislation could be allowed.

### **3.7.2. Transfer of Personal Data of Sensitive Nature**

Sensitive personal data will be processed by our Company in accordance with the principles specified in this Policy and **by taking all necessary administrative and technical measures, including the methods to be determined by the Board under the terms and conditions set out in articles 8 and 9 of the Law.**

### **3.7.3. THIRD PARTIES TO WHICH PERSONAL DATA IS TRANSFERRED AND THE PURPOSE OF SUCH TRANSFER**

In accordance with Articles 8 and 9 of the Law, our Company may transfer customers' personal data to the following categories of persons:

- (i) Suppliers
- (ii) Zorlu Holding Anonim Şirketi and Other Group Companies
- (iii) Legally Authorized Private Entities
- (iv) Legally Authorized Public Institutions and Organizations

The scope of the abovementioned persons to whom the transfer has been made and the purposes of data transfer are stated below.

Persons to Whom Data will be Transferred	Definition
<b>Suppliers</b>	<p>Your personal data will be shared with the parties from whom the service is received as data controllers and who have their own processing purposes and means in order to carry out the processes of our company.</p> <ul style="list-style-type: none"> <li>• Financial institutions for the conduct of financial and accounting transactions,</li> <li>• Our suppliers from whom we receive services in software, maintenance, security and personal data hosting within the scope of information technologies;</li> <li>• Consultancy offices from whom we receive services regarding our legal processes,</li> </ul>
<b>Zorlu Holding Anonim Şirketi and Other Group Companies</b>	<p>Personal data will be shared with Zorlu Holding Anonim Şirketi to monitor the compliance of our Company's processes with the legislation and Company's procedures, basic principles and rules and to receive support services regarding the legal disputes. Yet, personal data may also be transferred to the relevant group company within the scope of the processes such as intragroup mergers and acquisitions.</p>
<b>Legally Authorized Public Institutions and Organizations</b>	<p>Your personal data will be shared with public institutions and organizations authorized to receive information and documents from our Company in accordance with the provisions of the relevant legislation.</p> <ul style="list-style-type: none"> <li>• Courts, Notary Public Offices, Police Department, EMRA, etc.</li> </ul>
<b>Legally Authorized Private Entities</b>	<p>Your personal data is shared with institutions or organizations established in accordance with certain conditions determined by law in accordance with the provisions of the relevant legislation and which continue their activities within the framework determined by the law.</p> <ul style="list-style-type: none"> <li>• Mediators</li> <li>• Independent Audit Companies</li> </ul>

#### **4. SECTION 4 - STORAGE AND DESTRUCTION OF PERSONAL DATA**

Our Company retains personal data only for the period specified in the relevant legislation or for the purpose for which such data has been processed. In this context, our Company in the first place determines whether a period has been stipulated for the storage of personal data in the relevant legislation and if a period has been stipulated, then it acts in compliance with this period. If there is no legally prescribed period, personal data will be stored for the period required for the purpose for which they are processed. Personal data will be destroyed at the end of the specified storage periods in accordance with the periodic destruction periods or at the data subject's request and by using the prescribed destruction methods (deletion and/or destruction and/or anonymization).

#### **5. SECTION 5 - RIGHTS OF PERSONAL DATA SUBJECTS AND EXERCISING THESE RIGHTS**

##### **5.1. RIGHTS HELD BY THE DATA SUBJECT**

Personal data subjects shall be entitled to the following:

- (1) To learn whether personal data has been processed or not,
- (2) To request information if personal data has been processed,
- (3) To learn the purpose of processing personal data and whether they are used appropriately in accordance with this purpose,
- (4) To have information about third parties to which personal data is transferred either in Türkiye or abroad,
- (5) To request the correction of personal data if it is incomplete or improperly processed and to request that the process carried out in this context be notified to third parties to whom personal data is transferred,
- (6) To request that personal data be deleted or destroyed even if it has been processed in accordance with the provisions of the Law and other relevant laws and in the case that the reasons for such processing are not present any more to request that the process carried out in this context be notified to third parties,
- (7) To object to the occurrence of a result against the person itself by means of analyzing the processed data exclusively through automated systems,
- (8) To demand that damages be eliminated in the event of a corruption due to the processing of personal data contrary to the law,

## **5.2. EXERCISING THE RIGHTS HELD BY THE DATA SUBJECT**

Personal data subjects may submit their requests regarding their rights as listed in section 6.1. ("*Rights Held by the Data Subject*") to our Company using the methods determined by the Board. Pursuant to this, they will be able to utilize the "Data Subject Request Form" to be accessed at the address [zorluenerji.com.tr/en](http://zorluenerji.com.tr/en).

## **5.3. OUR COMPANY'S RESPONSE TO REQUESTS**

Our Company takes the necessary administrative and technical measures in accordance with the Law and the secondary legislation to conclude the requests filed by personal data subjects.

In the case the personal data subject duly communicates his/her request regarding the rights listed in section 6.1 ("*Rights of the Personal Data Subject*") to our Company, we will conclude the requests within the shortest time possible depending on the nature of the request and within thirty days at the latest and free of charge. However, if the procedure requires an additional cost, fees may be charged in accordance with the tariff determined by the Board.