



The İstor Kuyumculuk Personal Data Protection Policy ("Policy"), integral to the İstor Kuyumculuk Code of Ethics, aims to establish a compliance framework for İstor Kuyumculuk companies in adhering to legislation on the protection and processing of personal data. This Policy ensures that the processing of personal data by İstor Kuyumculuk companies is conducted in accordance with lawfulness, fairness, and transparency. Employees and executives are required to follow this Policy, and Business Partners are expected to adhere to its principles where relevant.

Definitions

- "Explicit Consent": Informed consent related to a specific subject, given freely.
- "Anonymization": Altering personal data such that it can no longer be associated with an identified or identifiable natural person.
- "Data Subject": Any real person whose personal data is processed.
- "Business Partners": Includes suppliers, vendors, authorized services, representatives, subcontractors, and consultants acting for or on behalf of the company.
- "Personal Data": Information related to an identified or identifiable natural person.
- "Processing of Personal Data": Activities such as collecting, storing, updating, or any operation performed on personal data.
- "İstor Kuyumculuk": Refers to all entities under the direct control of İstor Kuyumculuk
- "Legislation": Refers to all relevant laws regarding personal data protection, especially Law No. 6698 on the Protection of Personal Data.
- "Special Categories of Personal Data": Data concerning race, ethnicity, political opinions, religious beliefs, health, sexual life, and similar sensitive aspects.
- "VERBİS": Data Controllers Registry Information System.
- "Data Processor": An entity that processes data on behalf of the data controller.
- "Data Controller": The entity that defines the purpose and means of processing personal data.

General Principles

Violating this Policy may have severe repercussions, including legal, administrative, or criminal penalties, and damage to İstor Kuyumculuk's reputation. Compliance with legislation and the principles of personal data processing is paramount.

Application of The Policy

İstor Kuyumculuk rigorously implements its Personal Data Protection Policy across all operational facets to ensure compliance with the prevailing personal data protection legislation. This section delineates the structured approach and the essential steps İstor Kuyumculuk undertakes to align its activities with the defined policy directives:

1. **Personal Data Processing Conditions Compliance:** İstor Kuyumculuk engages in processing personal data strictly based on the conditions outlined in the applicable legislation. Before initiating any data processing activity, İstor Kuyumculuk ascertains that it is grounded on one of the legally defined conditions, ensuring legitimacy and adherence to legal prerequisites.
2. **Special Categories of Personal Data Handling:** Special attention is given to processing sensitive personal data, aligning with the stringent conditions stipulated by the legislation. İstor Kuyumculuk takes all necessary technical and administrative measures to safeguard these data categories, ensuring processing activities meet the legal benchmarks and the explicit consent requirements, especially concerning health and sexual life data, are rigorously followed unless stipulated otherwise by law.
3. **Data Transfer Protocols:** In transferring personal data to third parties, İstor Kuyumculuk maintains strict compliance with the purposes of data processing and the legal basis, alongside implementing requisite security measures. The company designs its processes to be in harmony with the legislative conditions for data transfer, ensuring the protection of data subjects' rights.
4. **Personal Data Protection and Processing Obligations:** Fulfilling obligations related to personal data protection involves several key activities, including:
 - **VERBİS Registration:** İstor Kuyumculuk ensures registration with VERBİS as mandated by the legislation, keeping the registry information timely updated in response to any changes.



İSTOR KUYUMCULUK SAN. VE TİC. A.Ş.
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- **Periodic Review and Reporting:** The company commits to a semi-annual review of its VERBİS registrations and any updates, reporting the findings to the designated legal and compliance departments to ensure continuous compliance.

İstor Kuyumculuk's dedication to the meticulous application of its Personal Data Protection Policy underscores its commitment to safeguarding personal data integrity and adhering to legal standards. This policy application framework is instrumental in guiding İstor Kuyumculuk's operations towards ethical and lawful data handling practices, reflecting the company's core values of responsibility, transparency, and respect for individual privacy.

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APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

İstor Kuyumculuk San. ve Tic. A.Ş.

PREPARED AND APPROVED BY İSTOR KUYUMCULUK BOARD OF DIRECTORS