



**POLICY ON PROTECTION AND PROCESSING OF  
PERSONAL DATA OF BTA HAVALİMANLARI YİYECEK VE İÇECEK  
HİZMETLERİ ANONİM ŞİRKETİ**

## CHAPTER 1 INTRODUCTION

### 1.1. INTRODUCTION

Protection of personal data is one of the top priorities of T BTA Havalimanları Yiyecek ve İçecek Hizmetleri Anonim Şirketi (the “Company” or “BTA”) and all its subsidiaries (“BTA Group Companies”) as defined below, and our Company and BTA Group Companies make every effort to comply with all applicable legislation in this regard. The most important pillar of this issue is the Policy on Protection and Processing of Personal Data, of BTA Havalimanları Yiyecek ve İçecek Hizmetleri Anonim Şirketi and BTA Group Companies (“Policy”).

Within the framework of this Policy, the principles adopted in the performance of personal data processing activities carried out by our Company and BTA Group Companies, and the basic principles adopted in terms of compliance of our Company's data processing activities with the regulations contained in the Personal Data Protection Law No. 6698 (the “Law”) are explained, and thus our Company ensures necessary transparency by informing the data subjects. With full awareness of our responsibility in this regard, your personal data shall be processed and protected within the scope of this Policy.

### 1.2. SCOPE

This Policy applies to all personal data of the persons other than employees of our Company and BTA Group Companies, that are processed by automated means or - provided that they are part of any data filing system - non-automated means.

Detailed information about such data subjects can be accessed via the ANNEX-1 document (“ANNEX 1 - Data Subjects”) of this Policy.

The activities carried out by our Company and BTA Group Companies related to the protection of the personal data of our employees, are managed under BTA Havalimanları Yiyecek ve İçecek Hizmetleri Anonim Şirketi ve BTA Group Companies Policy on Protection and Processing of Employees' Personal Data, which is written in parallel with the principles of this Policy.

This Policy applies to all employees working at BTA and its Subsidiary Companies below in Turkey:

1. BTA Unlu Mamuller Pasta Üretim Turizm Gıda Yiyecek ve İçecek Hizmetleri Sanayi ve Ticaret Anonim Şirketi
2. BTA Uluslararası Yiyecek İçecek Hizmetleri ve Ticaret Anonim Şirketi
3. Tasfiye Halinde BTA Denizyolları ve Limanları Yiyecek ve İçecek Hizmetleri Turizm Sanayi ve Ticaret Anonim Şirketi
4. Tasfiye Halinde BTA Tedarik Dağıtım ve Ticaret Anonim Şirketi



These companies shall be hereinafter referred to as the "BTA Group Companies".

The Policies for the Protection and Processing of Personal Data of BTA Group Companies shall be regulated and managed separately in accordance with the provisions set out in this Policy. BTA Group Companies that do not have separate Policies shall manage the PDPL compliance process in accordance with the provisions set out in this Policy.

This Policy is a guiding document for other BTA subsidiaries that are not specified in the scope and is a guide for BTA Group Companies established abroad, and shall be regulated in accordance with the legal regulations of the country where these Companies are located.

This Policy shall also apply to all other companies that will be established within the scope of BTA's "Group Companies" (*where BTA is the sole shareholder, directly or indirectly, taking into account the companies listed above*), after the publication date hereof.

### 1.3. DEFINITIONS

<b>Explicit Consent</b>	: The consent given with limited scope, being informed and freely on a specific subject, for the purpose of data processing.
<b>Anonymization</b>	: Rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data.
<b>Employee(s)</b>	: Employees of the Company and the Group Companies
<b>Confidential Information</b>	: refers to information of critical importance at such a degree that, if it is disclosed, may cause financial damage to BTA or the Group Companies, disrupt their services, affect their relations with customers and/or suppliers, reduce the motivation and productivity of the employees, undermine their reputation/brand value, and cause the imposition of sanctions pursuant to laws/regulations.  Confidential Information may be contained on a paper document or in electronic media (Company server, Computer, USB Memory Stick, Portable External Disk, Tablet Computer, Smartphone, CD, DVD, etc.).

<b>Human Resources Departments</b>	: Human Resources Departments of the Company and the Group Companies.
<b>Personal Data</b>	: All kinds of information relating to an identified or identifiable natural person.
<b>Data Subject</b>	: The natural person, whose Personal Data are processed. For example; customers, suppliers, employees, etc.
<b>Processing of Personal Data</b>	: All kinds of transactions performed on the data, such as obtaining, recording, storing, keeping, amending, rearranging, disclosing, transferring, taking over, rendering obtainable, classifying, or preventing the use of personal data by fully or partially automatic means or by non-automatic means as part of any data recording system.
<b>PDP Law</b>	: The Personal Data Protection Law No. 6698, dated 24 March 2016, published in the Official Gazette, numbered 29677 and dated April 7, 2016.
<b>PDP Supervisors</b>	: The supervisors who shall ensure necessary coordination in the Company and Group Companies within the scope of ensuring, protecting, and maintaining the compliance by the Company, with the legislation on protection of Personal Data, and who shall work affiliated to the PDP Committee.
<b>Private Personal Data</b>	: The data relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations or trade-unions, health, sexual life, criminal convictions of, and security measures imposed on, Persons and their biometric and genetic data
<b>Policy</b>	: BTA Havalimanları Yiyecek ve İçecek Hizmetleri Anonim Şirketi Policy on Protection and Processing of Personal Data.
<b>Company</b>	: BTA Havalimanları Yiyecek ve İçecek Hizmetleri Anonim Şirketi
<b>Data breaches</b>	: The incidents where reasonable doubts arise regarding any unlawful seizure, collection,



modification, copying, distribution, or use of personal data.

- Data Protection Officer** : The person who works under the Compliance Department of BTA, and is responsible for the continuous management and development of the PDP Compliance Program at BTA and Group Companies according to the PDP Law and related legislation.
- Data Controller** : The person who determines the purposes and means of processing Personal Data and manages the place where the data are kept systematically.
- Senior Management** : Members of the Executive Committee at BTA and the Group Companies

## 1.4. BASIS DOCUMENTS

This Policy has been prepared for compliance of the activities carried out by BTA and the Group Companies, with the PDP Law, relevant secondary legislation, and the decisions of the PDP Board, by taking into account all relevant local laws and regulations, internal and general policies and procedures in force for the purpose of protecting and processing of personal data.

## CHAPTER 2

### PROVISIONS RELATED TO THE PROCESSING OF PERSONAL DATA

#### 2.1. Processing of Personal Data in Accordance with the Principles Set Forth in the Legislation

##### ***2.1.1. Processing Lawfully and In Compliance with Honesty Principle***

Personal data shall be processed in accordance with the general principle of trust and honesty, in such a way that it shall not harm the fundamental rights and freedoms of persons. In this context, personal data shall be processed to the extent, and limited to, as required by the business activities of our Company and BTA Group Companies.

##### ***2.1.2. Ensuring that Personal Data is Accurate and Kept Up-to-date when Necessary***



Our Company and BTA Group Companies shall take necessary measures to ensure that personal data is accurate and up-to-date during the period of processing, and shall establish necessary mechanisms to ensure the accuracy and up-to-dateness of personal data, in certain intervals.

### ***2.1.3. Processing for Specified, Explicit and Legitimate Purposes***

Our Company and BTA Group Companies shall clearly set out the purposes for processing personal data, and also shall process them in line with their business activities within the scope of the purposes related to these activities.

### ***2.1.4. Being Relevant, Limited, and Proportionate to the Purposes for Which they are Processed***

Our Company and BTA Group Companies shall collect only personal data having the nature, and to the extent, as required by business activities and process them limited to the specified purposes.

### ***2.1.5. Keeping Them the Period Laid Down by Relevant Legislation or Required for the Purpose for Which the They are Processed***

Our Company and BTA Group Companies shall store personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the relevant legislation. In this context, our Company shall first determine whether a period is stipulated for the storage of personal data in the relevant legislation and, if a period is determined, shall act in accordance with this period. If there is no legal period, personal data shall be stored for the period required for the purpose for which they are processed. Personal data shall be destructed at the end of the specified storage periods in accordance with the periodic destruction periods or the data owner's request and by the determined destruction methods (deletion and/or destruction and/or anonymization).

## **2.2. Conditions For Processing Of Personal Data**

The explicit consent of the personal data owner is only one of the legal grounds that makes the lawful processing of personal data possible, and in the existence of one of the following conditions, personal data shall be processed by our Company and BTA Group Companies without the explicit consent of the data subject.

Except for express consent, the basis of personal data processing may be only one of the following conditions as well as more than one condition may be the basis of the same personal data processing activity. If the processed data is the Private Personal Data, the terms contained in title 2.3 of this Policy ("Processing of Private Personal Data") and the provisions of the Policy on Protection and Processing of Private Personal Data shall apply.

### ***2.2.1. Expressly Provided for by the Laws.***

If it is expressly provided for in the law, in other words, if there is a clear provision in relevant law regarding processing of personal data, personal data of the data subject may be processed by our Company and BTA Group Companies within the framework stipulated in the legislation.

### ***2.2.2. Inability to Obtain Explicit Consent of the Person Concerned due to Practical Impossibility***

If the processing of personal data is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to any practical impossibility or whose consent is not deemed legally valid, the personal data of the data subject may be processed.

### ***2.2.3. Being Directly Related to the Entering Into or Performing a Contract***

If processing of personal data of the parties of a contract is necessary, this condition may be deemed to have been met provided that it is directly related to the establishment or performance of the contract.

### ***2.2.4. Fulfillment of the Legal Obligations by the Company***

If data processing is mandatory for our Company and BTA Group Companies to meet their legal obligations, the personal data of the data subject may be processed.

### ***2.2.5. Making Personal Data Public by the Data Subject***

If the personal data have been made public by the data subject himself/herself, the personal data may be processed limited to the purpose of making them public.

### ***2.2.6. Data Processing is Necessary for the Establishment or Protection of any Right***

If the processing of data is necessary for the establishment, exercise or protection of any right, personal data of the data subject may be processed.

### ***2.2.7. Processing is Necessary for the Legitimate Interest of our Company***

If the processing of data is mandatory for the legitimate interests of our Company and BTA Group Companies, personal data of the data subject may be processed, provided that this should not impair fundamental rights and freedoms of the data subject.

## **2.3. Processing of Private Personal Data**

Special attention is attached to the personal data deemed sensitive, due to the risk of victimization or discrimination of persons when such data are processed unlawfully. These "private" personal data are the data relating to the race, ethnic origin, political



opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations or trade-unions, health, sexual life, criminal convictions of, and security measures imposed on, Persons and their biometric and genetic data.

Private personal data shall be processed by our Company and BTA Group Companies in accordance with the principles set out in this Policy by taking all necessary administrative and technical measures, including the methods determined by the Board and if the following conditions are met:

- (i) Private personal data, **other than the ones related to health and sexual life**, may be processed without the explicit consent of the data subject, if it is clearly stipulated in the law, in other words, there is a clear provision in the law regarding the processing of personal data. Otherwise, explicit consent of the data subject shall be taken.
- (ii) **Private personal data related to health and sexual life** may be processed without explicit consent by the persons or authorized institutions and organizations under the confidentiality obligation for the purpose of protecting public health, preventive medicine, medical diagnosis, treatment, and care services, planning and management of health services and their financing. Otherwise, explicit consent of the data subject shall be taken.

## 2.4. Categories of Personal Data Processed and Purposes of Processing

The categories of personal data processed by our Company and BTA Group Companies in accordance with the Law and other relevant provisions of the legislation within the framework of the purposes and conditions set out in this Policy and detailed information about these categories can be accessed via ANNEX-2 (“Categories of Personal Data”) of this Policy.

In accordance with the Law and other relevant legislation, within the scope of the conditions for the processing of personal data and Private Personal Data detailed in this Policy, the purposes of personal data processing of our Company and BTA Group Companies are as follows:

1. Planning and/or executing human resources policies and processes of our Company and BTA Group Companies,
2. Planning and/or execution of the activities to ensure the legal and technical security of our Company and BTA Group Companies and related persons in business relations with our Company/ BTA Group Companies,
3. Planning and/or performing the activities required for recommending and promoting the products and services offered by our Company and BTA Group Companies and/or for and on behalf of our Company and BTA Group Companies, by customizing them according to taste, usage habits and needs of related persons,



4. Making necessary studies/works and conducting related business processes in order to provide related persons with the opportunity to benefit from the products and/or services offered by our Company and BTA Group Companies and/or for and on behalf of our Company and BTA Group Companies,
5. Making necessary studies/works, by our related business units, for the performance of commercial and/or operational activities carried out by our Company and BTA Group Companies, and conducting the business processes in relation thereto,
6. Planning and/or implementing commercial and/or business strategies of our Company and BTA Group Companies

Detailed information about such processing purposes can be accessed via the ANNEX-3 document ("**ANNEX 3 - Processing Purposes of Personal Data**") of this Policy.

## CHAPTER 3

### PROVISIONS RELATING TO TRANSFERRING PERSONAL DATA

Our company and BTA Group Companies can transfer the personal data and private personal data of the data subject, to third parties by taking necessary security measures in line with the lawful purposes of personal data processing. Our Company and BTA Group Companies shall comply with the provisions set forth in articles 8 and 9 of the Law, in this respect. Detailed information on this issue can be accessed via ANNEX ("**ANNEX 4 - Third Parties to Which Personal Data is Transferred by our Company and the Purposes of Transfer**") of this Policy.

#### 3.1. Transfer of Personal Data:

If one or more of the following conditions are met, even without the express consent of the data subject, personal data may be transferred to third parties by taking due care and taking all necessary security measures, including the methods prescribed by the Board, by our Company and BTA Group Companies.

- In case the activities relating to processing of personal data, are expressly provided for in the laws,
- Transfer of personal data by the Company and BTA Group Companies is directly related to and necessary for the establishment or execution of a contract,
- Transfer of personal data is mandatory for our Company and BTA Group Companies to fulfill their legal obligations or for the execution of business processes,
- Transfer of personal data by our Company and BTA Group Companies in a limited manner for making them public, provided that the data subject has already made them public,

- If the transfer of personal data by the Company and BTA Group Companies is mandatory for the establishment, use or protection of the rights of the Company and BTA Group Companies, or the data subject, or third parties.
- If it is mandatory to engage in personal data transfer activities for the legitimate interests of the Company, provided that it does not damage the fundamental rights and freedoms of the data subject.
- If the processing of personal data is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the practical impossibility, or whose consent is not deemed legally valid.

If personal data is to be transferred abroad, in addition to the above conditions, personal data shall be transferred by our Company and BTA Group Companies to foreign countries declared by the Board to have adequate protection (the “**Foreign Countries Providing Adequate Level Protection**”) or, if there is no enough protection, to foreign countries where the data controllers in Turkey and the relevant foreign country undertake adequate protection in writing (the “**Foreign Countries of Data Controller Undertaking Adequate Protection**”) and for which permission is given by the Board.

### 3.2. Transferring Private Personal Data:

Private personal data may be transferred by our Company and BTA Group Companies in accordance with the principles set out in this Policy by taking all necessary administrative and technical measures, including the methods determined by the Board and if the following conditions are met:

- (i) Private personal data, other than the ones related to health and sexual life,** may be transferred without the explicit consent of the data subject, if it is clearly set forth in the law, in other words, there is a clear provision in the law regarding the processing of personal data. Otherwise, explicit consent of the data subject shall be taken.
- (ii) Private personal data related to health and sexual life** may be transferred without explicit consent by the persons or authorized institutions and organizations under the confidentiality obligation for the purpose of protecting public health, preventive medicine, medical diagnosis, treatment, and care services, planning and management of health services and their financing. Otherwise, explicit consent of the data subject shall be taken.

If Private Personal Data are to be transferred abroad, Private Personal Data shall be transferred to Foreign Countries Providing Adequate Level Protection or to Foreign Countries of Data Controller Undertaking Adequate Protection.



## CHAPTER 4

### INFORMING DATA SUBJECT

Our Company and BTA Group Companies shall inform the data subjects in accordance with Article 10 of the Law and secondary legislation, about who processes their personal data as a data controller, the purposes for which they process, the purposes for which they share with whom, the methods they use to collect and its legal grounds, and the rights that data subjects have within the scope of the processing of their personal data.

## CHAPTER 5

### STORAGE AND DESTRUCTION OF PERSONAL DATA

Our Company and BTA Group Companies shall store personal data for the period required for the purpose for which they are processed and for the period set forth in the relevant legislation. In this context, our Company and BTA Group Companies shall first determine whether a period is set forth for the storage of personal data in the relevant legislation and, if a period is set forth, shall act in accordance with that period. If there is no legal period, personal data shall be stored for the period required for the purpose for which they are processed. Personal data shall be destroyed at the end of the specified storage periods in accordance with the periodic destruction periods or the data owner's request and by the determined destruction methods (deletion and/or destruction and/or anonymization). The provisions of the Company's Policy on Storage and Destruction on Personal Data, shall apply to this in relation to the process.

## CHAPTER 6

### PROVISIONS IN RELATION TO PROTECTION OF PERSONAL DATA

Our Company and BTA Group Companies take necessary measures pursuant to Article 12 of the Law based on the nature of the data to be protected to prevent unlawful disclosure, access, transfer, or other security deficiencies that may occur in other forms of personal data. In this context, our Company and BTA Group Companies take administrative measures, carry out audits, or have them carried out, to ensure the necessary level of security in accordance with the guidelines published by the Personal Data Protection Board ("**Board**").

In this context, the technical and administrative measures taken by our Company and BTA Group Companies for the protection of personal data, are applied carefully in terms of Private Personal Data and the necessary audits are provided within our Company.

## **6.1. Raising Awareness of the Business Units on the Protection and Processing of Personal Data and Supervision Thereof**

Our Company and BTA Group Companies provide the business units with the necessary training in order to raise awareness about the unlawful processing of personal data, preventing unlawful access to data, and ensuring the preservation of data.

Our Company and BTA Group Companies shall establish the necessary systems to raise awareness of the existing employees and newly recruited employees about the protection of personal data and, if necessary, shall work with consultants on this issue. Accordingly, our Company and BTA Group Companies shall evaluate participation in related trainings, seminars and information sessions and shall organize new trainings in parallel with updating the relevant legislation.

Our Company and BTA Group Companies shall also conduct audits at regular intervals and shall take actions to improve processes.

## **CHAPTER 7**

### **RIGHTS OF DATA SUBJECTS AND EXERCISING THESE RIGHTS**

#### **7.1. Rights of Data Subject**

The data subjects have the following rights:

- 1) To learn whether personal data are processed or not,
- 2) If personal data are processed, to request information in relation thereto,
- 3) To learn the purpose of processing personal data and whether they are used in compliance with intended purpose,
- 4) To know the third persons, to whom personal data are transferred in Turkey and abroad,
- 5) In case personal data are processed incompletely or incorrectly, to request the correction thereof and to request that any operation carried out in this context is reported to the third persons, to whom personal data are transferred,
- 6) Despite being processed in compliance with the provisions of this Law and other relevant laws, to request that personal data shall be erased or destroyed in the event that the reasons for the processing no longer exist and any operation carried out in this context is reported to the third persons, to whom the personal data are transferred,
- 7) To object to the occurrence of a result against the person himself/herself by analyzing, solely through automated systems, the data processed,
- 8) To claim indemnification of any damage arising from unlawful processing of personal data.

#### **7.2. Exercising By The Data Subject, Of His/ Her Rights**



Data subjects can submit their requests for the rights listed in Section 7.1 (“**Rights of the Data Subject**”) to our Company by the means determined by the Board. Accordingly, they shall be able to use the “Data Subject Request Form”, which can be accessed via <http://bta.com.tr/kvkk> or the respective web address of the relevant BTA Group Company.

### 7.3. Responding To The Applications By Our Company

Our Company and BTA Group Companies take the necessary administrative and technical measures to finalize requests to be made by the data subject in accordance with the law and secondary legislation.

If data subject sends his/her request in respect of the rights contained in Section 7.1 (“**Rights of Data Subject**”) to our Company and BTA Group Companies in accordance with the due process, our Company and BTA Group Companies shall finalize the request free of charge as soon as possible and within 30 (thirty) days at the latest depending on the nature of the request. However, if the action requires any extra cost, a fee may be charged in accordance with the tariff set by the Board.

## CHAPTER 8

Annex-1 Personal Data Subjects

Annex-2 Personal Data Categories

Annex-3 Processing Purposes of Personal Data

Annex-4 Third Parties to Which Personal Data Is Transferred And Purposes of Transfer

## ANNEXES

### ANNEX-1 PERSONAL DATA SUBJECTS

CATEGORY OF PERSONAL DATA SUBJECT	EXPLANATION
<b>Employee / Candidate Apprentice</b>	: Refers to natural persons who have applied for a job via any means to our Company or who have opened their resume and related information to our Company's review.
<b>Other 3rd Persons</b>	: Refers to the natural persons and other 3rd persons included in this Policy but not covered by the BTA Havalimanları Yiyecek ve İçecek Hizmetleri Anonim Şirketi Policy on Protection and Processing of Employees' Personal Data,
<b>Former Employee</b>	: Refers to natural persons whose employment contract with our Company has been ended for any reason (leaving job, termination of contract, retirement, etc.).
<b>Employee / Official / Shareholder of Business Partner</b>	: Refers to natural persons who are shareholders, officials, or employees of the companies with which our Company has established a business partnership for purposes such as sales, promotion, and marketing of our Company's Products and Services, conducting after-sales support, joint customer loyalty programs, while carrying out our Company's commercial activities.
<b>Customer</b>	: Refers to natural persons who use, have already used, or apply for the purpose of using the products and services offered by our Company, or whose request is under evaluation, or who are employees, officials, or shareholders of natural persons or legal entities.
<b>Potential Customer</b>	: Refers to natural persons who are employees, officials, or shareholders of the natural or legal persons who have no request or interest in using our products and services but who have been assessed in accordance with the rules of commercial practice and honesty as having this interest.
<b>Employee / Official / Shareholder of Supplier</b>	: Refers to natural persons who are shareholders, officials or employees of the companies that provide goods and/or services to our Company in accordance with the contract, exists and/or is likely to be established, between our Company and it.
<b>Visitor</b>	: Refers to natural persons who have visited our Company's premises, websites or joined our Company's guest internet network.

## ANNEX-2 PERSONAL DATA CATEGORIES

PERSONAL DATA CATEGORIES	EXPLANATION
<b>Information on Family Members and Relatives</b>	: Refers to the information about the family members and relatives of our customers, guarantors, employees, employee candidates and/or employees of our suppliers.
<b>Information on Vehicles</b>	: Refers to the information on the vehicles affiliated with the data subject (e.g. plate number).
<b>Information on Employee Candidates</b>	: Refers to the resume information of our employees and/or candidate apprentices who have applied for a job via any means to our Company.
<b>Information on Audit and Inspection</b>	: Refers to personal data processed during internal or external audit activities within the scope of our Company's legal obligations and compliance with the company's policies.
<b>Financial Information</b>	: Refers to personal data processed in relation to information, documents, and records showing all kinds of financial results created according to the type of legal relationship established with the data subject by our Company, as well as data such as bank account number, IBAN number, credit card information, financial profile, asset data, and income information.
<b>Physical Space Security Information</b>	: Refers to the data such as personal data, camera records, and visitor records related to the records and documents obtained at the entrance to the physical space and during the stay within the physical space.
<b>Audiovisual Data</b>	: Refers to the data that has a visual or auditory nature, such as photos, videos, etc.
<b>Information on Legal Action and Compliance</b>	: Refers to personal data processed within the scope of determination, enforcement, and performance of our legal receivables and claims, as well as compliance with our legal obligations and our Company's policies.
<b>Contact Information</b>	: Refers to phone number, address, e-mail, and similar contact information
<b>Process Security Information</b>	: Refers to personal data (e.g. log records) that are processed to ensure our technical, administrative, legal, and commercial security while performing our business activities.
<b>Identity Information</b>	: Refers to data that contains information about the person's identity. (The documents such as driver's license, ID card, and passport containing information such as Name-Surname, T.R. identification number, nationality information, mother's name-father's name, place of birth, date of birth, gender, as well as tax number, etc.)
<b>Customer Transaction Number</b>	: Refers to information such as records of the use of our products and services and instructions and requests of our customers for the use of our products and services.



<b>Request/Complaint Information</b>	:	Refers to personal data relating to the receipt and evaluation of any requests and/or complaints submitted to our Company.
<b>Private Personal Data</b>	:	Refers to the data relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations or trade-unions, health, sexual life, criminal convictions of, and security measures imposed on, Persons and their biometric and genetic data.



## ANNEX-3 PROCESSING PURPOSES OF PERSONAL DATA

PRIMARY PURPOSES	SECONDARY PURPOSES
<p><b>For the purposes of planning and/or performing our Company's human resources policies and processes</b></p>	<p>Planning and/or conducting the application, selection and evaluation processes of employee candidates</p>
	<p>Planning and/or performing internal/external communication activities necessary for the placement of employee candidates and/or students and/or apprentices</p>
	<p>Planning and/or performing activities that should be carried out within the framework of occupational health and/or safety and/or educational activities</p>
	<p>Planning and/or performing reference and/or intelligence activities for personnel recruitment and/or Company security processes</p>
	<p>Planning and/or performing the recruitment, placement, and operation processes of apprentices and/or students</p>
<p><b>Planning and/or performing the activities for ensuring the legal and technical security of our Company and of related persons who have business relations with our Company</b></p>	<p>Planning and/or performing the relations with the main shareholders</p>
	<p>Following legal processes</p>
	<p>Planning and/or performing activities to provide and record information or documents and requests demanded by official institutions and/or organizations</p>
	<p>Follow-up of contract processes and/or legal claims</p>
	<p>Ensuring security of the Company's fixtures and/or resources</p>
	<p>Planning and/or performing the operational activities necessary to ensure that the Company's activities are carried out in accordance with the Company's procedures and/or relevant legislation</p>
	<p>Ensuring the security of the Company's operations</p>
	<p>Ensuring the security of the Company's compounds and/or facilities</p>
<p>Planning and/or performing internal/external audit, inspection,</p>	

	<p>investigation and/or control activities of our Company</p> <p>Planning and/or performing the activities of carrying out the transactions of companies and partnership laws</p> <p>Creating and/or monitoring visitor records</p>
<p><b>Planning and/or performing the activities required for recommending and promoting the products and services offered by our Company and/or for and on behalf of our Company, by customizing them according to taste, usage habits and needs of related persons</b></p>	<p>Designing and/or performing the activities to be developed on customer acquisition and/or value creation in existing customers in digital and/or other media</p>
	<p>Designing and/or performing individual marketing and/or promotional activities (data enrichment, profiling, segmentation, etc.)</p>
	<p>Planning and/or performing data analytics studies for marketing purposes</p>
	<p>Identifying and/or evaluating people who will be the subject in marketing activities in accordance with consumer behavior criteria</p>
	<p>Planning and/or performing marketing processes of products and/or services</p>
<p><b>Making necessary studies/works and conducting related business processes in order to provide related persons with the opportunity to benefit from the products and/or services offered by our Company and/or for and on behalf of our Company</b></p>	<p>Evaluating customer requests and/or complaints collected in digital and/or other media</p>
	<p>Creating and/or monitoring the processes of application for and/or sales of products and/or services</p>
	<p>Payment processing and/or its tracking of products/services</p>
	<p>Planning and/or performing customer relationship management processes</p>
<p><b>Making necessary studies/works, by our related business units, for the performance of commercial and/or operational activities carried out by our Company, and conducting the business processes in relation thereto</b></p>	<p>Planning and/or performing the activities related to event and organization management</p>
	<p>Follow-up of finance and/or accounting works</p>
	<p>Performing and/or planning of printed and/or visual or auditory communication activities to be shared with internal and/or external stakeholders</p>
	<p>Planning and/or performing business activities</p>

	Carrying out the necessary activities for planning and/or performing the accommodation and meeting organizations
	Planning and/or performing corporate communication activities
	Planning and/or performing logistics/transportation activities
	Planning and/or performing social responsibility and/or civil society activities
	Planning and/or performing procurement processes
	Planning and/or performing internal/ external corporate reporting activities
	Planning and/or performing supply chain management processes
<b>Planning and/or implementing commercial and/or business strategies of our Company</b>	Planning and/or performing the Company's financial risk processes

## ANNEX- 4 THIRD PARTIES TO WHICH PERSONAL DATA IS TRANSFERRED AND PURPOSES OF TRANSFER

Persons to which Data Transfer can be Made	Definition	Purpose of Data Transfer
<b>Supplier</b>	<p>Refers to the parties that provide services to our Company in accordance with the purposes and instructions of our Company for data processing within the scope of the conduct of our Company's commercial activities.</p> <ul style="list-style-type: none"> <li>As part of the realization of payments, personal data shall be shared with banks which are members of the Banks Association of Turkey, or with other financial institutions.</li> </ul>	<p>Refers to the parties with whom our Company cooperates for the purposes such as conducting joint programs in events, organizations, or similar activities while carrying out its commercial activities.</p>
<b>Business Partner</b>	<p>Refers to the parties with whom our Company cooperates for purposes such as conducting joint programs in events, organizations or similar activities while carrying out its commercial activities.</p>	<p>Personal data shall be transferred on a limited basis in order to ensure that the objectives of the establishment of a business partnership are met.</p>
<b>Group Companies</b>	<p>Refers to group companies affiliated with BTA Havalimanları Yiyecek ve İçecek Hizmetleri Anonim Şirketi</p> <p>The group companies affiliated with BTA Havalimanları Yiyecek ve İçecek Hizmetleri Anonim Şirketi can be found in the list available at the <a href="http://www.bta.com.tr">[http://www.bta.com.tr]</a> web address.</p>	<p>As part of the assessment of employee candidates, personal data is transferred to group companies that are, directly or indirectly, affiliated with BTA Havalimanları Yiyecek ve İçecek Hizmetleri Anonim Şirketi i upon the consent of the employee candidate.</p>
<b>Shareholders</b>	<p>Refers to the shareholders, especially Aéroports de Paris Groupe, that are authorized to carry out the processes related to the operational and commercial activities of our Company, design its strategies and audit activities in accordance</p>	<p>Personal data shall be transferred in accordance with the provisions of the relevant legislation, limited to the performance of the processes related to the operational and commercial</p>

	with the provisions of the relevant legislation.	activities of our Company, the design of strategies, and audit purposes.
<b>Legally Authorized Public Institutions and Organizations</b>	<p>Refers to 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, enforcement offices, tax offices, etc.</li> </ul>	Personal data shall be transferred being limited to the purpose requested by relevant public institutions and organizations, within their legal authority.
<b>Legally Authorized Private Institutions</b>	<p>Refers to institutions or organizations that are established in accordance with certain conditions legally set forth under the provisions of relevant legislation and continue their activities within the framework set out by the law.</p> <ul style="list-style-type: none"> <li>• Personal data shall be shared with the companies providing services as independent auditors, within the scope of carrying out independent audit activities.</li> </ul>	Personal data shall be shared on a limited basis concerning the issues involved in the activities carried out by relevant private institutions and organizations and for the purpose of ensuring that the fringe rights and interests are provided to our employees.