

1.CHAPTER 1-INTRODUCTION

1.1.INTRODUCTION

Personal data protection is regarded as one of the most important priorities of Arçelik. The adopted principles for the personal data protection facilities are declared through herein Arçelik Group Companies Personal Data Processing and Protection Policy (“**Policy**”). Herein Policy covers data processing activities of Company which is you related with and part of Arçelik Group Companies mentioned below (“**Company**”) Within this frame with the full recognition of our duties, personal data are processed and protected within scope of Policy derived from Law On The Protection Of Personal Data no.6698 (“**Law/Legislation**”). Accordingly, our Company ensures transparency by informing Data Subjects.

- Arçelik Anonim Şirketi

Arçelik Anonim Şirketi located at Karaağaç Street No:2/6 Beyoğlu/Istanbul and Registered in Trade Registry with 54957 registration number

- Arçelik Pazarlama Anonim Şirketi

Arçelik Pazarlama Anonim Şirketi located at Karaağaç Street No:2/6 Beyoğlu/Istanbul and Registered in Trade Registry with 63851/5 registration number

The processing activities of our company regarding the personal data protection of Arcelik’s employees are managed under the Arcelik Group Companies Employees’ Personal Data Protection and Processing Policy which is written in accordance with Policy.

1.2 SCOPE

Policy covers either automatically processed or nonautomatically processed personal data of individuals providing it is not part of any data recording system. It is important to notice that Policy does not include employees of our company. Detailed information regarding Data Subjects can be received in Appendix 2 of this document.

1.3. IMPLEMENTATION OF THE POLICY AND APPLICABLE LAW

Applicable Law in effect regarding Data Protection and Processing will be prior in terms of implementation. In case of a contradiction between this Policy and the applicable Law, our company declares that the applicable law will prevail. The Policy embodies and regulates rules provided by Law, in the scope of our Company’s operations.

1.4. EXECUTION OF POLICY

The Policy has been executed by our Company on [26.12.2018]. In the event the of amendment either partly or completely, execution date of Policy shall be updated. Policy is published on our website (www.arcelik.com.tr) and the Policy will be given access to relevant person upon request of Data Subject.

2. CHAPTER 2- ISSUES REGARDING PROTECTION OF PERSONAL DATA

2.1. ENSURING SECURITY OF PERSONAL DATA

In accordance with Article 12 of Law, our company takes measures and provide appropriate level of safety considering features of protected data in order to prevent unlawful processing of personal data, unlawful access to personal data and other kind of security lacks. Accordingly, in accordance with the guides published by Data Protection Authority, Our Company takes administrative measures and conducts audits or has them conducted to ensure necessary security level.

2.2. PROTECTION OF SPECIAL CATEGORIES OF PERSONAL DATA

Special categories of personal data are given importance by the Law due to fact that when special categories of data are processed unlawfully, risk of victimisation or discrimination may occur. Data relating to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade-union, data relating health and sexual life, criminal conviction and security measures, and biometric and genetic data are regarded as special categories of personal data.

Within this scope, technical and administrative measures taken to ensure security of personal data are carefully considered in terms of special categories of personal data and our Company carries out necessary auditing activities.

Detailed information regarding processing special categories of personal data is provided in Section 3.3

2.3. RAISING AWARENESS OF BUSINESS UNITS ON THE PROTECTION AND PROCESSING OF PERSONAL DATA AND THEIR SUPERVISION

Our company provides necessary training programs that aim to raise awareness in terms of preventing unlawful access to personal data and retention of personal data.

Since our company aims at raising awareness regarding data protection, our company constructs systems that ensure security of personal data of existing and prospective employees. If it is needed, Our company works with consultants. Accordingly, our company assesses training programs and seminars and provides new training programs and seminars in correlation with recent changes in legislation.

3. CHAPTER 3-MATTERS CONCERNING PERSONAL DATA

3.1. PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH PRINCIPLES SETH FORTH BY LAW

3.1.1. PROCESSING IN CONFORMITY WITH THE LAW AND GOOD FAITH

Personal data shall be processed lawfully and fairly without harming fundamental rights and freedoms. Within this framework, personal data are proportionally processed to the required extent and restricted with the business activities of our Company.

3.1.2. ENSURING PERSONAL DATA TO BE ACCURATE AND IF NECESSARY, UP TO DATE

Throughout processing period, our company takes measures to ensure that personal data are up to date and accurate. Additionally, our company establishes necessary mechanisms that facilitates accuracy and up-to-dateness.

3.1.3. PROCESSING FOR SPECIFIED, EXPLICIT, AND LEGITIMATE PURPOSES

Our company explicitly reveals its aims in line with its business activities of our company

3.1.4. RESTRICTED, RELATED WITH PROCESSING REASON AND; PROPORTIONALITY

Our company collects Personal Data to extend that our company's business activities require, and processes personal data restricted with specific aims.

3.1.5. CORRELATED WITH PROVISIONS PROVIDED BY RELATED LEGISLATIONS AND RESTRICTED WITH PERIOD REQUIRED BY NATURE OF PROCESSING

Our Company stores Personal Data for period required by nature of processing and minimum extend provided in related legislation. Within the Scope, Initially, our company determines whether specific period is provided or not; if specific period is determined, our company acts in accordance with provided period. Otherwise, personal data are stored for a period required by aim of processing. Personal data that is processed in accordance with the Law or relevant other laws shall be deleted, destroyed or anonymised either ex officio or upon request by the data subject in case the reasons necessitating their processing cease to exist.

3.2. PROCESSING CONDITIONS OF PERSONAL DATA

Except for explicit consent of data subject, legal ground of processing personal data can be one or more than one of the grounds that are mentioned below. If the processed data is considered as special category of personal data, conditions provided by Section 3.3. in herein Policy shall be applied.

(I)Explicit Consent of Data Subject

One of the conditions of processing personal data is explicit consent of Data Subject. Explicit consent of Data Subject must be given wilfully, through a specific subject which is properly defined.

In the existence of conditions below, explicit consent of Data Subject is not necessary to process personal data.

(ii)Processing of Personal Data is Expressly Permitted by Any Law

If there is a provision that expressly allows personal data protection, herein conditions exist.

(iii) Absence of Data Subject's Explicit Consent Due to Physical and Legal Incapability

Personal data of data subject can be processed in order to protect the life or physical integrity of the data subject or another person where the data subject is physically or legally incapable of giving consent.

(iv) Direct Relation Between Performance of a Contract and Personal Data Processing

Provided that there is direct link between establishing a contract or performance of a contract and Personal Data Processing, herein condition can be considered.

(v) Performance of a Legal Obligation that Company is Subject to

If it is necessary to process personal data for our company to perform a legal obligation, personal data of Data Subject can be processed.

(vi)Public Disclosure of Relevant Data by Data Subject her/himself

When the relevant information is revealed to the public by the data subject her/himself, personal data can be processed to the extend intention of data subjects while revealing it.

(vii) Processing Which is Necessary for the Institution or Protection of Right

If processing is necessary for the institution, usage, or protection of a right, it can be processed.

(viii) Legitimate Interest of Company

Provided that not to harm fundamental human rights and freedoms, in cases that our Company's legitimate interest requires processing personal data, personal data of Data Subject can be processed.

3.3. PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA

Our company processes special categories of personal data in accordance with principles determined in herein Policy; additionally, the methods provided by Data Protection Authority are taken into consideration while processing Special Categories of Personal Data. In order to process Special Categories of Personal Data, conditions mentioned below are required:

(i) **Special Categories of Personal Data Excluding Health and Sexual Life** may be processed without explicit consent of data subject, if there is expressly provisions which provides that specific Special Categories of Personal Data can be processed. Otherwise, explicit consent of Data Subject is required.

(ii) **Special Categories of Personal Data Regarding Health and Sexual Life** may only be processed without obtaining the explicit consent of the data subject for purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment, and care services, planning and management of health services and financing by persons under the obligation of secrecy or authorized institutions and organizations. Otherwise, explicit consent of Data Subject is required.

3.4. INFORMING THE DATA SUBJECT

In accordance with Article 10 of Law and secondary legislation, our Company informs the data subjects while collecting the personal data with regard to the identity of the data controller and if any, its representative, the purposes for which personal data will be processed, the persons to whom processed personal data might be transferred and the purposes for the same and the method and legal reasons of collection of personal data.

3.5. TRANSFER OF PERSONAL DATA

Our company, in line with processing aims, can transfer lawful personal data and special categories of personal data to third parties taking necessary measures. Our company acts in accordance with Article 8 of herein Law. Detailed information regarding this issue can be found in Appendix 4 of herein Policy. (Appendix 4- The Third Parties that Our company Transfers personal data and Aims of Transfer)

3.5.1. TRANSFER OF PERSONAL DATA

Even though explicit consent is not given by data subject, personal data can carefully transfer to third parties by taking safety measures including methods that Data Protection Authority provides, if one or more than one of conditions, given below, exist.

- a) It is expressly permitted by any law;
- b) It is necessary in order to protect the life or physical integrity of the data subject or another person where the data subject is physically or legally incapable of giving consent;
- c) It is necessary to process the personal data of parties of a contract, provided that the processing is directly related to the execution or performance of the contract;

- ç) It is necessary for compliance with a legal obligation which the controller is subject to;
- d) The relevant information is revealed to the public by the data subject herself/himself;
- e) It is necessary for the institution, usage, or protection of a right;
- f) Provided that the fundamental rights and freedoms of the data subject are not harmed, it is necessary for the legitimate interests of the data controller.

In addition to conditions given above, personal data can be transferred to foreign countries that are declared as countries have adequate level of protection by Data Protection Authority, if one or more of the conditions given above exists. In case of absence of an adequate level of protection, if the data controllers in Turkey and abroad commit, in writing, to provide an adequate level of protection and the permission of the Board exists; personal data can be transferred to abroad.

3.5.2. TRANSFER OF SPECIAL CATEGORIES OF PERSONAL DATA

Our Company can transfer special categories of personal data in accordance with principles provided herein Policy and taking necessary technical and administrative measures and in existence of conditions given below:

(I) Special Categories of Personal Data Excluding Health and Sexual Life may be transferred without explicit consent of data subject, if there is expressly provisions which provides that specific Special Categories of Personal Data can be processed. Otherwise, explicit consent of Data Subject is required.

(II) Special Categories of Personal Data Regarding Health and Sexual Life, may only be transferred without obtaining the explicit consent of the data subject for purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment, and care services, planning and management of health services and financing by persons under the obligation of secrecy or authorized institutions and organizations. Otherwise, explicit consent of Data Subject is required.

In addition to conditions given above, special categories of personal data can be transferred to foreign countries that are declared as countries have adequate level of protection by Data Protection Authority, if one or more of the conditions given above exists. In case there is not an adequate level of protection, if the data controllers in Turkey and abroad commit, in writing, to provide an adequate level of protection and the permission of the Board exists; personal data can be transferred to abroad.

4. CHAPTER 4- CATEGORIZATION, PROCESSING PURPOSES AND RETENTION PERIODS OF PERSONAL DATA PROCESSED BY OUR COMPANY

By informing the relevant parties in accordance with Article 10 of the Law, in line with the lawful and legitimate processing purposes of our Company based on and limited to one or more than one of the conditions for data processing set forth under Article 5 of the Law no. 6698, mentioned in Appendix 3

(Appendix 3- Categories of Personal Data) categories of personal data are processed in accordance with the principles based on Article 4 of the Law no. 6698 and other general principles and obligations provided under the Law and limited to the subjects.

Detailed information regarding processing aims can be found in Appendix 1(Appendix 1-Processing Aims)

5. CHAPTER 5 - RETENTION AND DESTRUCTION OF PERSONAL DATA

Our Company retains personal data for the period foreseen under the relevant laws.

In case a period for which the data shall be retained is not provided under the legislation, personal data shall be retained for a period as per the implementations of the Company with respect to the services provided while processing such data and the ordinary course of business and such data are then erased, destroyed or anonymized. Personal data are ceased to exist either ex officio at end of storage period or upon request by data subject, through following provided methods of destruction (Deletion or Destruction or Anonymization)

6. CHAPTER 6- RIGHTS OF DATA SUBJECTS AND EXERCISING THE RIGHTS

6.1. RIGHTS OF DATA SUBJECT

Data Subject has right to

- a. Learn whether or not her/his personal data have been processed;
- b. Request information as to processing if her/his data have been processed;
- c. Learn the purpose of processing of the personal data and whether data are used in accordance with their purpose;
- d. Know the third parties in the country or abroad to whom personal data have been transferred;
- e. Request rectification in case personal data are processed incompletely or inaccurately;
- f. Request deletion or destruction of personal data within the framework of the conditions set forth under article 7 of herein Law;
- g. Request notification of the operations made as per indents (d) and (e) to third parties to whom personal data have been transferred;
- h. Object to occurrence of any result that is to her/his detriment by means of analysis of personal data exclusively through automated systems;
- i. Request compensation for the damages in case the person incurs damages due to unlawful processing of personal data by applying to the data controller.

6.2. EXERCISING RIGHTS OF DATA SUBJECT

Data Subjects can convey their requests regarding rights, that are mentioned Article 6.1. of herein Policy, to our Company by methods provided by Data Protection Authority. Data subjects can benefit from Data Subject Form available in <http://www.arcelikas.com/sayfa/2165/kisisel-verilerin-korunmasi>.

6.3. RESPONSE OF COMPANY TO APPLICATIONS OF DATA SUBJECT

Our company takes administrative and technical measures in order to conclude applications of Data Subject in accordance with Law and secondary legislation.

Our company shall conclude the requests included in the application free of charge and as soon as possible considering the nature of the request and within 30 days at the latest. However, in case the operation necessitates a separate cost, the fee in the tariff designated by the Board may be collected.

APPENDIX-1 PERSONAL DATA PROCESSING AIMS

A) Planning and Execution of Human Resources Policies and Operations

- Planning of Human Resources Operations
- Recruitment of Employees
- Recruitment of Intern and Student and planning of operation and execution

B) Commercial Activities of Our Company

- Operation Management
- Planning and Execution of Operations
- Planning and Execution of Supply Chain Processes
- Planning and Execution of Authorization of Business Partners and Providers to Access to Information
- Execution of Finance and Accounting Activities
- Planning and Execution of Acquisition Operations
- Planning and Execution of Corporate Communication Operations
- Planning and Execution of Corporate Management Operations
- Planning and Execution of Manufacturing Processes
- Planning and Execution of effectiveness, efficiency and pertinence of analysis regarding Business Activities
- Planning, Execution and Examination of Information Security Processes
- Planning and Execution of Corporate Sustainability Activities
- Planning and Execution of Logistical Activities
- Planning and Execution of Operations Regarding Continuity of Business Activities
- Designing and Managing Information Technologies Substructure

-Planning and Execution of Social Responsibility and Civil Society Activities

C)Execution of Business Processes Regarding Business Unit Activities that provides benefit from Our Company's Goods and Services to Related Person

-Planning and Execution of Post Sale Customer Support Service Activities

-Execution of Contracts and Legal Demands

-Execution of Customer Demands and Complaints

-Planning and Execution of Customer Relations

-Execution of Relations with Business Partners and Providers

-Planning and Execution of Goods and Services Sales

D)Planning and Execution of Commercial and Business Strategies of Company

-Planning and Execution of External Training Activities,

-Execution of Strategic Planning Activities

-Execution of Relations with Business Partners and Providers

E)Planning and Execution Activities Required to Promote Company and Offer Good and Services Specified Through Preferences and Usage Habits of Data Subject

-Planning and Execution of Marketing Processes of Goods and Services

-Detection and Assessment of Marketing Subjects through Customer Behaviour Criteria

-Planning and Execution of Activities Regarding Enhancement and Development of Experiences of User who benefit from Company's Goods and Services

-Designing and Execution of Personal Marketing and Personal Promotion Activities

-Planning and Execution of Company's Production and Operational Risk Processes

-Designing and Execution of Commercial, Promotion and Marketing Activities in Digital and Other Platforms

-Planning and Execution of Data Analytics with the Intention of Marketing

-Planning and Execution of Marketing Research for Sales and Marketing of Goods and Services

-Planning and Execution of Activities Regarding Trademark Communication and Reputation

-Planning and Execution of Processes Regarding Creation and Enhancement of Customer Loyalty

-Ensuring Customer Satisfaction and Organizing Competitions and Sweep-takes with the intention of Marketing

-Planning and Execution of Business Continuity Activities

F)Providing Technical, Legal and Commercial Occupational Safety to Company and Related Person Have Business Relation with Company

-Visitor Records and Monitoring Visitor Records

-Planning and Execution of Activities Required to Ensure that Business Activities of Company are Operated in Accordance with Company Procedures and Related Legislation

-Providing Safety to Company's Operations

-Assurance of Accurate and Up to Date Data

-Planning and Execution of Financial Risk Processes of Company

-Execution and Planning of Company's Audit Activities

-Execution of Legal Transactions stem from Company Law

-Informing Entitled Organizations Regarding Information Provided by Related Legislations

-Execution of Legal Transactions

-Providing Safety to Company's Resources and Fixtures, Examination of Company's Resources and Fixtures

-Planning and Execution of Occupational Health and Safety Processes

-Planning and Execution of Business Continuity Activities

-Providing Safety of Company's Premises and Facilities

-Planning and Execution of Emergency Management Processes

Appendix 2- Data Subjects

Data Subject Categories	Explanation
Customer	Natural Person who uses or has been used good and services which provided by our Company, contractual relation between mentioned natural person and Company is not necessary.
Potential Customer	Natural Person who request to use our good and services or shows interests to our goods and services or a natural person whose interests in our goods and services are detected in accordance with precedents and good faith
Visitor	Natural Person who enter physical campuses of our company or visit our websites

Third Party	To provide safety of commercial activities between mentioned parties above and other natural person who have relation with parties listed above or natural person not covered by herein policy and Arçelik Group Companies Employee Data Protection Policy
Employee Candidate	Natural Person who make job application in any way or make available her/his CV and related information to our company
Shareholder	Natural Person who have shares of our company
Company Officer	Natural Person who are member of board of management or other authorized employees
Employees, Shareholders and Officials of Institutions that Our Company Cooperates	Natural persons who are an employee, shareholder or official of the institutions that our Company has any kind of business relations with (including but not limited to business partner, supplier)

Appendix 3-Categories of Personal Data

Categories of Personal Data	Explanation
Personal Identity Information	Any personal data processed for obtaining the information that is required for the establishing the basis of personnel rights of our employees or real persons having a working relation with our Company; which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
Contact Information	Phone number, address, e-mail address
Location Data	Data that detects Data Subject's location while Data Subject uses our goods and services or our Employees and Employees of Corporations which we work with
Customer Information	Information that acquired and produced as a result of our commercial activities and the operations executed by our working groups within commercial frame
Information of Family Members and Relatives	Processed information about Data Subject's family members and relatives, Within Scope of Company's commercial activities regarding goods and services provided by Company or to Protect legal and any kind of interest of company and customer
Customer Transaction Information	Information which is identified or identifiable and placed in our data record system; such as records intended to use of our goods and services and information regarding demands and instructions related our customers usage of our goods and services.
Physical Premises Security Information	Personal data relating to the records and documents obtained when entering to physical

	premises and during the stay in such premises which explicitly belongs to an identified or identifiable real person and are a part of the data recording system, such as camera records, fingerprints and records received at security desk.
Transaction Security Information	Data Subject's personal data that Our Company process in order to provide technical, legal and commercial safety
Risk Management Information	Personal data processed by means in accordance with legal principles, customs of trade and principles of good faith for us to manage our commercial, technical and administrative risks which explicitly belongs to an identified or identifiable real person and are a part of the data recording system.
Financial Information	Data which explicitly belongs to an identified or identifiable person, is processed partly or completely part of recording system that is automatic or non-automatic; created in correlation with type of legal relationship between Our Company and Data Subject Such as information, documents and records indicate financial results, IBAN numbers, credit card information, financial profile, income certificates and asset data
Personal Information	Any personal data processed for obtaining the information that is required for the establishing the basis of personnel rights of our employees or real persons having a working relation with our Company; which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
Candidate Employee Information	Data of natural person who applied for a job in Our Company and assessed as candidate Employee by our Company's HR department in accordance with precedents and processed data of our employees
Special Categories of Personal Data	Data relating to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade-union, health, sexual life, criminal conviction and security measures, and biometrics and genetics
Marketing Information	Data Processed to promote Company and Offer Good and Services Specified Through Preferences and Usage Habits of Related Person and documents and evaluations resulting from mentioned processing
Demand/Complaint Management	Data Processed within the scope of evaluation of complaints and demands directed to Company

Visual and Auditory Data	Information which explicitly belongs to an identified or identifiable real person, such as photograph or camera records (except data belonging to Physical Premises Security Information category), voice recording and copies of documents containing personal data
Audit and Inspection Information	Your personal data processed within the scope of compliance with the legal obligations of our Company and Company policies, such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system
Legal Procedure and Compliance Information	Data processed within scope of legal obligations determination and execution of Company's claims and rights, discharge debts and compliance through Company's policies

Appendix 4- Third Parties that Our Company Transfers Data and Transfer Purposes

In Accordance with Article 8 and 9 of Law, Our Company Can Transfer Personal Data to Listed Categories of Person

- (I) Shareholders
- (ii) Business Partners
- (iii) Providers
- (vi) Affiliates
- (v) Legally authorized entities of private law
- (vi) Legally authorized public entities and institutions
- (vii) Koç Group Companies
- (viii) Board of Directors members of the Company

Scope of Third Parties who can obtain Personal Data through transfer and Purposes of Transfer are explained below:

Categories of Person	Definition	Aim of Transfer
Business Partner	The dealers that Our Company cooperates to sale goods and services of our company and have other transaction (List of Our Company's Dealers can be found in https://www.arcelik.com.tr/arcelik-bayileri)	Restricted with aim of reason behind construction of Business Partnership

Provider	Within the framework of Our Company's financial activities, parties that provides service in accordance with company's data processing aims and instructions	Restricted with aim of providing external services that required for Our Company to undertake commercial activities
Affiliates	Companies that Our Company is a shareholder and controls	Restricted with commercial activities that requires participation of affiliates
Shareholders	According to provisions of related legislations Authorized regarding determination of commercial activities of our company and planning of audit activities Koç Holding Incorporate Company	Restricted with determination of commercial activities of our company and planning of audit activities in accordance with provisions of related legislations
Legal Entities of Private Law	In accordance with provisions of related legislation, established through legally determined conditions institutions and organizations that act according to legally determined framework	Limited with the purposes of the request made by the organization and institution within the scope of their legal authorization.
Legally Authorized Public Organizations and Institutions	In accordance with the relevant legislation, public organizations and institutions authorized to receive information and documentation from the Company	Restricted with the purposes of the request made by the organization and institution within the scope of their legal authorization.
Koç Group Companies	(List of Koç Group Companies can be found in www.koc.com.tr)	Limited to the business transactions to be carried out with the group companies and auditing purposes.
Board of Directors Members of the Company	Management Board of Company	Restricted with aim of execution of Management Board of Company Activities