

## **1. SECTION 1 – INTRODUCTION**

### **1.1. INTRODUCTION**

Protection of personal data is one of the issues with highest priority for Ata Holding Anonim Şirketi (the “Company”). Within the framework of this Ata Holding Anonim Şirketi Personal Data Protection and Processing Policy (the “**Policy**”), the principles adopted in execution of personal data processing activities carried out by our Company and fundamental principles adopted for ensuring compliance of our Company’s data processing activities with the regulations under the Personal Data Protection Law numbered 6698 (the “Law”) are explained, and our Company provides the necessary transparency by informing personal data subjects in this manner. Being fully aware of our responsibility within this scope, your personal data is hereby processed and protected within the scope of this Policy.

The activities conducted by our Company in regard with protection of personal data of our employees are managed under the Policy on Protection and Processing of Personal Data of Ata Holding Anonim Şirketi Employees that is arranged in parallel with the principles set out in this Policy.

### **1.2. SCOPE**

This Policy relates to all personal data of persons other than our Company’s employees, which are processed through automatic, or as part of any data recording system, through non-automatic means. Detailed information concerning such personal data subjects is available in the document entitled ANNEX 2 (“*ANNEX-2- Data Subjects*”).

### **1.3. IMPLEMENTATION OF THE POLICY AND APPLICABLE LEGISLATION**

For processing and protection of personal data, legal regulations currently in effect will be implemented in priority. Our Company accepts that effective legislation will prevail in case of any conflict between effective legislation and the Policy.

The Policy has been arranged by concretising the rules set out in the related legislation within the scope of Company’s practices.

### **1.4. EFFECTIVENESS OF THE POLICY**

This Policy that has been issued by our Company has been updated in April 2023. If the Policy or its specific articles is/are amended, the Policy and its date will be updated. The Policy will be published on our Company’s website [www.ataholding.com.tr](http://www.ataholding.com.tr) if found necessary by our Company. The Policy is a living document and publication of the Policy on our Company’s website carries the aim of revealing our Company’s approach on the issue of protection of personal data and giving information on the subject. It is not possible for third parties to claim rights in reliance upon this Policy.

## **2. SECTION 2 – MATTERS REGARDING PROTECTION OF PERSONAL DATA**

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

In accordance with Article 12 of the Law, our Company takes the necessary measures, depending on category of personal data, for preventing unlawful access to, unlawful processing and transfer of personal data or any other security vulnerabilities and for ensuring that such data are kept safe. Within this scope, our Company takes technical and administrative measures, performs, or causes performance of, inspections for ensuring the necessary level of security in compliance with the guides that have been published by the Personal Data Protection Board (the “**Board**”).

## **2.2. PROTECTION OF SPECIAL CATEGORY PERSONAL DATA**

Special importance is attributed as per Law for data that are considered as sensitive data because of the risk of causing aggrievement and discrimination to persons when they are unlawfully processed.

Pursuant to Article 6 of the Law, “special category” personal data” are identified as personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, way of clothing, membership with associations, foundations or trade-unions, data concerning criminal convictions and security measures as well biometric and genetic data (“**Special category personal data other than health and sexual life**”), data concerning health and sexual life (“**Special category personal data concerning health and sexual life**”).

Technical and administrative measures by our Company for protection of personal data are taken within the scope of sufficient measures as envisaged in the Decree dated 31 January 2018 and numbered 2018/10 of the Board in respect of special category personal data and actions to this effect are monitored and inspected within the scope of inspections carried out within our Company’s organisation.

Detailed information concerning processing of special category personal data is available in Section 3.3 of this Policy.

## **2.3. RAISING AWARENESS OF BUSINESS UNITS ON PROTECTION AND PROCESSING OF PERSONAL DATA, AND INSPECTION**

Our Company ensures that necessary trainings are provided for business units for raising their awareness on preventing unlawful processing of personal data, unlawful access to personal data and ensure the protection of the data. Training and awareness activities organised by our Company are created by taking as basis the “Personal Data Security Guide” that is published by the Authority on its official website.

Trainings and awareness activities aim to ensure that personal data processing activities in the course of our employees’ performance of their job duties are conducted in compliance with the Law and the secondary legislation.

Our Company establishes the necessary systems for building awareness regarding protection of personal data in existing employees and the employees who recently join the company’s organisation, and works with advisors if needed. For this purpose, our Company evaluates participations in relevant trainings, seminars and informative sessions and organises new trainings in line with updates to the related legislation.

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

### **3.1. PROCESSING OF PERSONAL DATA IN COMPLIANCE WITH THE PRINCIPLES ENVISAGED UNDER THE LAW**

#### **3.1.1. Processing in Compliance with Law and Based on the Rule of Honesty**

Personal data are processed in compliance with the principles of general trust and honesty ensuring that no harm will be caused to fundamental rights and freedoms of persons. Within this framework, personal data are processed to the extent required by and limited to the business activities of our Company.

### **3.1.2. Ensuring Personal Data Are Accurate, and When Necessary, Up-to-Date**

Our Company takes the necessary measures for ensuring that personal data are accurate and up-to-date for the period during which they are processed and sets up the necessary mechanisms for ensuring that they are accurate and up-to-date for specific durations.

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

Our Company clearly demonstrates the purposes for which the personal data are processed and processes personal data within the scope of purposes related with business activities and in line with such activities.

### **3.1.4. Being Related, Limited and Proportional to the Purpose of Processing**

Our Company collects personal data only to the extent required for business activities and processes them limited to the specified purposes.

### **3.1.5. Keeping for The Period Envisaged Under the Law and Required for The Purpose for Which they Are Processed**

Our Company keeps the personal data for the period required for the purpose for which are processed and for the minimum period envisaged under the related legislation. Within this scope, our Company determines whether a period was envisaged or not in the relevant legislation for keeping of personal data, if a period was determined, acts in compliance with such period. If there is no period envisaged under the law, personal data are kept for the period required for the purpose for which they are processed. Personal data are destroyed at the end of designated periods for keeping in compliance with periodical destruction intervals or in line with the application of the data subject through designated destruction methods (deletion and/or destruction and/or anonymisation).

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

Except for the circumstances where explicit consent of the data subject is obtained, the basis of personal data processing activity may be only one of the following conditions or more than one of the conditions may also serve as basis for personal data processing activity. If the processed data are special category personal data, the conditions given under paragraph 3.3 of this Policy (“Processing of Special Category Personal Data”) will be implemented.

### **(i) Obtaining Explicit Consent of the Data Subject**

One of the conditions for processing of personal data is explicit consent of the data subject. The explicit consent of the data subject must be disclosed in relation to a certain subject-matter, based on being informed and at free will.

In case the below personal data processing conditions are present, the personal data may be processed without the need for explicit consent of the data subject.

### **(ii) Being Explicitly Envisaged Under the Laws**

The personal data of the data subject can be processed if it is clearly specified in the law, or in other words, this data processing condition can be deemed to be present if there is an explicit provision in the relevant law concerning processing of personal data.

**(iii) Failure to Obtain Explicit Consent of the Data Subject Due to Actual Impossibility**

If it is compulsory to process the personal data of a person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be deemed valid, for purposes of protecting the life or physical integrity of such person or another person, the personal data of such data subject may be processed.

**(iv) Being Directly Related with Establishment or Performance of a Contract**

This condition may be deemed to have been fulfilled if processing of personal data is required with the condition that it is directly related with establishment or performance of a contract to which the data subject is party.

**(v) Fulfilment of a Legal Obligation by the Company**

If processing is compulsory for our Company to fulfil its legal obligations, the personal data of the data subject can be processed.

**(vi) Personal Data of the Data Subject Having Been Made Public by the Data Subject**

If the data subject made his/her personal data public, the related personal data may be processed limited with the purpose of their being made public.

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

If data processing is compulsory for establishment, exercise or protection of a right, the personal data of the data subject can be processed.

**(viii) Data Processing Being Compulsory for our Company's Legitimate Interests**

The personal data of the data subject can be processed with the condition not to cause damage to the fundamental rights and freedoms of the data subject.

**3.3. PROCESSING OF SPECIAL CATEGORY PERSONAL DATA**

Special category personal data are processed in compliance with the principles set out in this Policy and by taking all kinds of administrative and technical measures including the methods to be designated by the Board and in case of presence of the conditions below:

**(i) Special category personal data other than health and sexual life** can be processed without seeking explicit consent of the data subject if it is clearly envisaged in the law, or in other words, if there is an explicit provision in the relevant law regarding processing of personal data. Otherwise, explicit consent of the data subject will be obtained.

**(ii) Special category personal data concerning health and sexual life** can be processed by persons who are under the obligation to keep secrets or by authorised institutions and organisations without seeking explicit consent for the purpose of protecting public health, conducting preventive medicine, medical diagnosis and treatment and care services, planning and management of healthcare services and its financing. Otherwise, explicit consent of the data subject will be obtained.

### **3.4. ENLIGHTENMENT OF THE PERSONAL DATA SUBJECT**

Our Company informs the personal data subjects in compliance with Article 10 of the Law and the secondary legislation regarding by whom as data controller, and for what purposes their personal data are processed, with whom and for what purposes they are shared, through what methods they are collected and legal grounds therefor, and the rights the data subjects holds within the scope of processing of their personal data.

### **3.5. TRANSFER OF PERSONAL DATA**

In line with lawful personal data processing purposes, our Company can, by taking the necessary security measures, transfer the personal data of the data subject to third parties (third party companies, group companies, third party real persons). Within this context, our Company acts in compliance with the regulations envisaged in Article 8 of the Law. Detailed information on this subject is available in the document entitled ANNEX 4 (*“ANNEX 4 – Third Parties to Whom Personal Data Are Transferred by Our Company and Purposes of Transfer”*).

#### **3.5.1. Transfer of Personal Data to Third Parties Residing Within the Country**

Even if explicit consent of the data subject is not available, personal data may be transferred to third parties by our Company by showing the required care and by taking all required security measures including the methods prescribed by the Board in case of presence of one or several of the data processing conditions set out below (**“Data Processing Conditions”**).

- the relevant activities for transfer of personal data are explicitly envisaged under the laws,
- transfer of personal data by the Company is directly related with institution or performance of a contract and is necessary,
- transfer of personal data is compulsory for our Company to be able to fulfil its legal obligation,
- with the condition that personal data have been made public by the data subject, transfer of such personal data by our Company in limitation with the purpose of their being made public,
- transfer of the personal data by the Company is compulsory for establishing, exercise or protection of the rights of the Company or the data subject or third parties,
- with the condition not to cause damage to the fundamental rights and freedoms of the data subject, performance of personal data transfer activities being compulsory for the Company’s legitimate interests,
- if it is compulsory to process the personal data of a person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be deemed legally valid, for purposes of protecting the life or physical integrity of such person or another person.

### 3.5.2. Transfer of Personal Data to Third Parties Residing Abroad

Transfer of personal data by our Company to abroad will be performed in line with the below issues depending on whether the country to which they will be transferred is or is not one of the safe countries as will be determined by the Board.

If the country to which transfer will be made is not one of the safe countries with sufficient protection as announced by the Board, personal data may be transferred to third parties abroad in the circumstances set out below in case of presence of at least one of the Data Processing Conditions and in compliance with the fundamental principles set forth in Article 4 of the Law.

- if explicit consent of the data subject is present,
- if the Company and the data recipient in the relevant country undertakes sufficient protection in writing and permission is obtained from the Board for relevant transfer

If the country to which transfer will be made is one of the safe countries having sufficient protection as announced by the Board, personal data may be transferred in case of presence of any of the Data Processing Conditions.

### 3.5.3. Transfer of Special Category Personal Data

Special category personal data may be transferred by our Company by taking all kinds of administrative and technical measures including the methods to be designated by the Board and in compliance with the principles set out in this Policy and in case of presence of the conditions set out below:

- (i) Special category personal data other than health and sexual life** may be processed without seeking explicit consent of the data subject if it is explicitly envisaged in the laws, in other words, if there is explicit provision in the laws concerning processing of personal data. Otherwise, explicit consent of the data subject will be obtained.
- (ii) Special category personal data concerning health and sexual life** may be processed without seeking explicit consent for purposes of protecting public health, conducting preventive medicine, medical diagnosis, treatment and care services, planning and management of healthcare services and its financing, by persons under the obligation to keep secrets or by authorised institutions and organisations. Otherwise, explicit consent of the data subject will be obtained.

## 4. SECTION 4 – CATEGORISATION OF PERSONAL DATA PROCESSED BY OUR COMPANY AND PURPOSES OF PROCESSING

Personal data are processed by our Company in compliance with the general principles set out in the Law, primarily, the principles set forth in Article 4 of the Law, based upon and limited to at least one of the Data Processing Conditions in line with personal data processing purposes that emerge within the framework of conduct of our Company's business activities.

Detailed information on such personal data processing purposes are given in ANNEX 1 of the Policy ("*ANNEX 1 – Purposes of Personal Data Processing*").

Categories of personal data processed by our Company within the scope of conduct of business activities and detailed information on such categories are available in the document entitled ANNEX 3 ("*ANNEX 3 – Personal Data Categories*") attached to the Policy.

## **5. SECTION 5 – STORAGE AND DESTRUCTION OF PERSONAL DATA**

Our Company keeps the personal data for the period required for the purpose for which they are processed and for the minimum period envisaged under the relevant legislation. Within this scope, our Company primarily determines whether a period has been envisaged in the relevant legislation or not for keeping of personal data, if a period has been prescribed, acts in accordance with such period. If there is no legal period, personal data are kept for the period required for the purpose of their being processed.

Personal data processed by our Company are evaluated on category basis, and for each personal data category, maximum data keeping periods have been identified in line with the relevant data processing process. Such periods are indicated in the chart given in our Company's Policy on Keeping and Destruction of Personal Data. At the end of designated periods for keeping of personal data, personal data are destroyed at periodic destruction intervals or in compliance with the data subject's application and through designated destruction methods (deletion and/or destruction and/or anonymisation).

## **6. SECTION 6 – DATA SUBJECTS' RIGHTS AND EXERCISE OF SUCH RIGHTS**

### **6.1. DATA SUBJECT'S RIGHTS**

Data subjects have the following rights:

- (1) to learn whether their personal data have been processed or not,
- (2) if their personal data have been processed, to request information thereon,
- (3) to learn the purpose of processing of personal data and whether they have been used in line with the purpose or not,
- (4) to learn about the third parties to whom personal data are transferred within or outside the country,
- (5) if personal data are processed deficiently or wrongly, to request correction of such data and to request that this procedure is notified to third parties to whom the personal data were transferred,
- (6) if, despite having been processed in compliance with provisions of the Law and other relevant legislation, the reasons that required processing are no longer available, to request that the personal data be deleted or destroyed, and to request that the procedure within this scope is notified to third parties to whom the personal data have been transferred,
- (7) to object to obtainment of a result to the disadvantage of the person through analysis of processed data exclusively through automatic means,
- (8) if the person incurs damage due to unlawful processing of personal data, to request that the damages be indemnified.

### **6.2. EXERCISE OF THE RIGHTS BY THE DATA SUBJECT**

Data subjects may communicate their requests listed in Section 6.1 ("*Data Subject's Rights*") to our Company via methods designated by our Board. For this purpose, they may benefit from the "Ata Holding A.Ş. Data Subject Application Form" which is available at the address [www.ataholding.com.tr](http://www.ataholding.com.tr).

### **6.3. OUR COMPANY'S RESPONSE TO APPLICATIONS**

Our Company takes the necessary administrative and technical measures to finalise the applications that will be filed by the data subject in compliance with the Law and the secondary legislation.

If the data subjects duly communicate its request in relation to the rights indicated in Section 6.1 (*"Data Subject's Rights"*), our Company will finalise the relevant request within the shortest possible time and within at the latest 30 (thirty) days depending on the nature of the request, free of charge. However, if the procedure requires any additional cost, fee may be charged according to the tariff designated by the Board.



## ANNEX 1 – Purposes of Processing of Personal Data

| PRIMARY PURPOSES   | SECONDARY PURPOSES  |
|--|---|
| <b>Planning and execution of our Company’s human rights policies and processes</b>   | Planning of human rights processes  |
|  | Conduct of personnel recruitment processes  |
|  | Planning and execution of trainee and student provision, placement and operation processes  |
| <b>Performance of necessary work by our related business units in order that commercial activities by our Company are realised and the associated business processes are conducted</b> | Planning and execution of corporate communication activities  |
|  | Event management  |
|  | Planning and execution of corporate management activities   |
|  | Planning and execution of business activities   |
|  | Follow-up of finance and accounting processes   |
|  | Set up and management of information technologies infrastructure  |
|  | Planning and execution of production and operation procedures   |
|  | Planning and execution of performance of efficiency/productivity and appropriateness analyses of business activities  |
| <b>Performance of necessary work by our business units to enable data subjects to benefit from services offered by our Company and conduct of relevant business processes</b>          | Planning of information security processes  |
|  | Follow-up of contractual processes and legal claims   |
| <b>Planning and execution of Company’s commercial and business strategies</b>  | Planning and execution of service sale procedures   |
|  | Execution of strategic planning activities  |
|  | Management of relationships with business partners and suppliers  |
|  | Planning and execution of customer satisfaction activities  |
| <b>Ensuring legal, technical and commercial-business security of the Company and data subjects who are in business relationship with the Company</b>                                   | Planning and execution of reporting activities  |
|  | Planning and execution of internal control and investigation processes within the Company   |
|  | Follow-up of legal affairs  |
|  | Performance of companies’ and partnership law processes   |
|  | Planning and execution of company inspection activities   |
|  | Ensuring security of company’s premises and facilities  |
|  | Planning and execution of Company’s financial risk processes  |
|  | Planning and execution of necessary operational activities for ensuring that Company’s activities are conducted in compliance with corporate procedures and the related legislation |
| Ensuring security of company’s operations  |   |

## ANNEX 2 – Data Subject

| DATA SUBJECT CATEGORIES   | DESCRIPTION   |
|---|---|
| <b>Visitor</b>  | real persons who enter into the physical premises owned by our Company for various purposes or who visit our website  |
| <b>Third party</b>  | in order to protect the security of the commercial transaction between our Company and the parties mentioned above or to protect the rights of such persons and to obtain interest, third party real persons who are associated with such persons (e.g. surety, family members and relatives) and other real persons who do not fall within the scope of this Policy and the Policy on Protection and Processing of Personal Data of Ata Holding Anonim Şirketi Employees |
| <b>Employee Candidate</b>   | real persons who have filed job applications with our Company by any means or who have made available their curriculum vitae and related data to the review of our company  |
| <b>Company Shareholder</b>  | real persons who are Company's shareholders   |
| <b>Company Authorised Person</b>  | our Company's board of directors' members and other authorised real persons   |
| <b>Family Members and Relatives</b>   | family members or relatives of the data subject within the framework of our Company's operations or in order to protect the legal and other interests of the Company and the data subject   |
| <b>Employees, Shareholders and Authorised Persons of Authorities With Which We Are in Cooperation</b> | real persons who work at institutions with which our Company has business relationship (such as, without limitation, business partner, authorised service station, supplier), including shareholders and authorised persons of such institutions  |

### ANNEX 3 – Personal Data Categories

| PERSONAL DATA CATEGORIES                 | DESCRIPTION  |
|--|--|
| <b>Identity Details</b>                  | Data involving information regarding the person's identity: documents such as driver's license, certificate of birth and passport including information like the name-surname, Turkish identification number, nationality, mother's-father's name, place of birth, date of birth, gender and tax identification number, Social Security Institution registration number, vehicle number plate and similar data   |
| <b>Contact Details</b>                   | Telephone number, address, e-mail, fax number  |
| <b>Family Members and Relatives Data</b> | Data regarding the family members and relatives of the data subject within the framework of our Company's operations and in relation to the services we offer or with an aim to protect legal and other interests of the data subject  |
| <b>Physical Premises Security Data</b>   | Personal data that evidently belong to an identified or identifiable real person and that is available in data recording system; data concerning records and documents taken at the time of entry into physical premises, stay inside physical premises; camera records, fingerprint records and records taken at security point, etc.   |
| <b>Transaction Security Data</b>         | Your personal data that are processed for protecting our technical, administrative, legal and commercial security at the time when we conduct our commercial activities (e.g. log records)   |
| <b>Risk Management Data</b>              | Personal data that are processed through methods used in compliance with legal, commercial precedents and principle of honesty, which are generally accepted in these fields   |
| <b>Financial Data</b>                    | Personal data which clearly belong to an identified or identifiable real person, processed, partly or in whole, through automatic means or as part of a data registration system, through non-automatic means, which are processed based on information, document and records showing all kinds of financial results that are created according to the type of legal relationship our company has entered into with the data subject, as well as data such as bank account number, IBAN number, credit card details, financial profile, property data, income data |
| <b>Employee Candidate Data</b>           | Personal data processed in relation to individuals who have filed applications for being our Company's employees or who were evaluated as employee candidates in line with our company's human resources requirements pursuant to commercial precedents and principle of honesty or who are in employment relationship with our Company  |

|   |  |
|---|--|
| <b>Special Category Personal Data</b>   | Data concerning persons' race, ethnic origin, political thought, philosophical belief, religion, religious sect or other beliefs, way of clothing, membership with associations, foundations or trade unions, health, sexual life, criminal convictions and security measures and biometric and genetic data |
| <b>Marketing Data</b>                   | Personal data that are processed for customising the services offered by our Group companies, in line with usage habits, likes and requirements of the data subject and marketing the same, and reports and evaluations created at the end of these processing results                                       |
| <b>Audio-Visual Data</b>                | photograph and camera records (except for records that fall within the scope of Physical Premises Security Data), audio records; which clearly belong to an identified or identifiable real person as well as data included in documents that are copies of documents containing personal data               |
| <b>Audit and Inspection Data</b>        | Personal data that are processed in the course of internal or external audit activities within the scope of our Company's compliance with its legal obligations and corporate policies   |
| <b>Legal Transaction and Compliance</b> | Personal data that are processed within the scope of determination and follow-up of our legal receivables and rights, and performance of our liabilities and compliance with our Company's policies  |

**ANNEX 4 – Third Parties to Whom Personal Data are Transferred by our Company and Purposes of Transfer**

Our Company may transfer the personal data of customers to the person categories listed below in compliance with Articles 8 and 9 of the Law:

- (i) Business Partners
- (ii) Suppliers
- (iii) Shareholders
- (iv) Subsidiaries
- (v) Private Law Persons Authorised By Law
- (vi) Governmental Institutions and Organisations Authorised By Law
- (vii) Group Companies
- (viii) Company’s Board of Directors’ Members

Scope of the above-listed persons to whom data are transferred and purposes of data transfer are described below.

| Persons to Whom Data May be Transferred         | Description  | Purpose of Data Transfer  |
|---|--|---|
| <b>Business Partner</b>                         | Investors and other parties with which our Company establishes business partnership at the time of conducting its commercial activities for purposes like performance of our Company’s programs related with sales, promotion and marketing of group companies’ services, after sales support, joint customer loyalty programs   | Limited with the aim of ensuring fulfilment of purposes of establishment of business partnership  |
| <b>Consultant / Service Provider / Supplier</b> | Parties providing services to our Company in line with our Company’s purposes and instructions for data processing within the scope of performance of our Company’s commercial activities (including Microsoft Office program which is the e-mail system used for continuity of commercial activities and Company’s internal management and human resources processes and the Cloud system that is used due to other programs associated therewith and managed by Microsoft) | limited to the purpose of ensuring provision of required services, which our Company procures externally from a Consultant/Service Provider / Supplier, in order for our Company to fulfil its commercial activities, and again since information technologies license and use of e-mail system is compulsory for ensuring continuity of company’s commercial activities and internal management as well as human resources processes |

|   |  |  |
|---|--|--|
| <b>Shareholders</b>   | Parties holding rights in our Company's shares   | pursuant to the provisions of applicable legislation, limited to the purpose of design and inspection of strategies related with our Company's commercial activities |
| <b>Subsidiaries</b>   | Companies in which our Company holds shares and which our Company controls are listed at <a href="http://www.ataholding.com.tr">www.ataholding.com.tr</a> under headings based on sectors  | for performance of commercial activities of our Company and management of human resources processes, which require also participation of subsidiaries                |
| <b>Governmental Authorities and Organisations Authorised By Law</b> | pursuant to the provisions of applicable legislation, governmental authorities and organisations authorised to obtain information and documents: for example; Capital Markets Board, Energy Market Regulatory Board, Ministries, tax and execution offices, authorised courts, Trade Registry Directorate and Chamber of Commerce, Competition Board | Limited to the purpose for which the relevant governmental authorities and organisations make a request within the scope of their legal authorisation                |
| <b>Private Law Legal Persons Authorised By Law</b>                  | means institutions and organisations that have been established pursuant to the provisions of applicable legislation, in compliance with specific conditions designated by law, and again, that continue their activities within the framework designated by law (e.g.; banks, independent auditors)   | limited to the issues that fall within the scope of activities conducted by relevant private institutions and organisations  |
| <b>Group Companies</b>  | You may reach the Group Companies at the address <a href="http://www.ataholding.com.tr">www.ataholding.com.tr</a> under headings specific to each sector   | for the purpose of management of human resources processes and commercial activities within the organisation of our Group Companies                                  |
| <b>Company Board of Directors' Members</b>                          | Company's Board of Directors' Members  | limited to the purpose of conducting Company's Board of Directors' activities  |