

PRIVACY STATEMENT ON THE PROCESSING OF PERSONAL DATA
“Investor Communication and General Assembly Procedures”

1. Data Controller

As Borusan Yatırım ve Pazarlama A.Ş. we value the importance on the protection of your personal data. In accordance with [Personal Data Protection Law No.6698](#) (the “**Law**”), we act as the data controller in the processing of the personal data of our investors.

With this Privacy Statement, we aim to inform you about how we process your personal data within the scope of communication with investors and general assembly procedures.

2. Processed Personal Data, Purposes of Processing and Legal Grounds

Article 5 of the Law regulates the legal grounds for processing personal data. Below, we outline the purposes for which we process personal data and the corresponding legal grounds on which we rely within the scope of such purposes:

Purposes of Processing Your Data	Legal Grounds for Processing	Processed Personal Data
<ul style="list-style-type: none">– Monitoring and managing the processes of requesting information and submitting inquiries to our company,– Responding to your inquiries and information requests regarding the general assembly,– Ensuring physical participation in the general assembly,– Creating the List of Attendees,– Fulfilling our legal obligations in cases where authorized institutions or organizations request information from the Company or when we are required to notify such institutions (<i>including disclosure of your information in case of the need to provide information to authorized institutions and organizations</i>)	<p style="text-align: center;"><u>Law Art. 5/2 (ç)</u> It is necessary for compliance with a legal obligation to which the data controller is subject.</p>	<ul style="list-style-type: none">– Identity (Name-Surname, Turkish ID number, nationality)– Contact (Phone number, e-mail address, address, company address)– Professional Experience (Name of the company the data subject works for, title)
<ul style="list-style-type: none">– Protecting and exercising our rights in case of a possible dispute as well as conducting legal proceedings.	<p style="text-align: center;"><u>Law Art. 5/2 (e)</u> Data processing is necessary for the establishment, exercise or protection of any right.</p>	<ul style="list-style-type: none">– Finance (Financial transaction information)– Visual and Audio Records (Audio recordings)

3. Third Parties with Whom Your Personal Data is Shared and Purposes of Sharing

Your personal data is shared with third parties in compliance with the rules regarding the transfer of personal data set forth in the Law and relevant regulations. The parties with whom data is shared and the purposes of such sharing are specified below:

- **Authorized Institutions and Organizations** → In cases where an authorized institution or organization requests information from our Company or where notification to such institutions is required, personal data is shared to fulfill legal obligations.
- **Suppliers and Business Partners** → Receiving infrastructure services for the storage of voice recordings, archiving the attendance list to provide information to competent authorities and organizations regarding investment processes and participants, and obtaining support from foreign suppliers that provide information technology infrastructures, products, and services.

Your personal data is transferred abroad in accordance with the rules stipulated in Article 9 of the Law, limited to the purposes and parties mentioned above. Borusan Holding acts in accordance with the rules stipulated in Article 9 of the Law when transferring your personal data abroad and takes all necessary administrative and technical measures to ensure that your personal data is processed by third parties securely and in accordance with this Privacy Statement.

4. Methods of Collecting Your Personal Data

The personal data specified above are collected through email, official institution records and lists, phone calls, and electronic platforms using automated and partially automated methods or non-automated methods, provided that they form part of a data recording system.

5. Rights of the Data Subject

Article 11 of the Law regulates the rights of data subjects. As a data subject, you may exercise your rights specified under Article 11 of the Law by choosing one of the following methods:

- Sending your requests via email to holdingkvkk@borusan.com **using the email address registered in our system** which you have previously provided to us.
- **Submitting your requests by post** to the following address: Pürtelaş Hasan Mahallesi Meclisi Mebusan Caddesi No.35/3 Salıpazarı, Beyoğlu, İstanbul.
- Using other methods outlined in the Communiqué on The Principles and Procedures for The Request to Data Controller to send your requests.