

UĞUR TENEKE AMBALAJ VE PLASTİK SANAYİ ANONİM ŞİRKETİ

(UĞUR TENEKE AMBALAJ VE PLASTİK SANAYİ ANONİM ŞİRKETİ - "Uğur Teneke Packaging and Plastics Industry Joint Stock Company")

PERSONAL DATA PROTECTION AND PROCESSING POLICY

1

1

TABLE OF CONTENTS

1. INTRODUCTION 2

1.1. Purpose and Scope of the Policy 2

1.2. Effectiveness and Amendment 2

2. DATA SUBJECTS, PURPOSES OF DATA PROCESSING AND DATA CATEGORIES RELATED TO THE PERSONAL DATA PROCESSING ACTIVITIES CARRIED OUT BY OUR COMPANY 2

2.1. Data Subjects 2

2.2. Purposes of Personal Data Processing 3

2.3. Activities Carried Out in Relation to the Processing of Personal Data 5

2.4. Personal Data Categories 6

3. PRINCIPLES AND CONDITIONS RELATING TO THE PROCESSING OF PERSONAL DATA 7

3.1. Principles Relating to the Processing of Personal Data 7

3.2. Conditions Relating to the Processing of Personal Data 8

3.3. Conditions Relating to the Processing of Special Categories of Personal Data 9

4. TRANSFER OF PERSONAL DATA 10

5. INFORMING DATA SUBJECTS AND THE RIGHTS OF DATA SUBJECTS 12

6. ERASURE, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA 13

7. LIMITATIONS ON THE SCOPE AND APPLICATION OF THE LAW 13

2

1. INTRODUCTION

1.1. Purpose and Scope of the Policy

This Personal Data Protection and Processing Policy ("Policy"), prepared within the framework of Law No. 6698 on the Protection of Personal Data (the "Personal Data Protection Law (KVKK)" or the "Law"), which entered into force on 7 April 2016, has been established by Uğur Teneke Ambalaj ve Plastik Sanayi Anonim Şirketi ("Uğur Teneke" or the "Company") in order to ensure that the Company acts in compliance with the Law in its personal data processing and protection processes, and to set out the fundamental principles adopted in this regard.

The purpose of this Policy is to ensure that the procedures and principles set out in the Law and other relevant legislation are aligned with the organization and processes of Uğur Teneke Ambalaj ve Plastik Sanayi Anonim Şirketi, and are effectively implemented in its activities. Uğur Teneke Ambalaj ve Plastik Sanayi Anonim Şirketi takes all kinds of administrative and technical measures for the processing and protection of personal data through this Policy, establishes the necessary internal procedures, raises awareness, and provides all necessary training to ensure awareness is instilled. All necessary measures are taken, and appropriate and effective control mechanisms are established, to ensure that shareholders, officers, employees and business partners comply with the Law's requirements.

This Policy sets out the principles relating to the processing of personal data and establishes the fundamental principles to be adopted by the Company in this field. Accordingly, the Policy covers all personal data processing activities carried out by the Company, the natural persons to whom such data belongs, and all types of personal data processed.

Matters relating to the processing of personal data of Company employees are excluded from the scope of this Policy and are instead governed by a separate document entitled "Uğur Teneke Ambalaj ve Plastik Sanayi Anonim Şirketi Policy on the Processing and Protection of Personal Data of Employees."

Uğur Teneke ensures the processing and security of personal data with a high sense of responsibility, in accordance with the principles set out in this Policy, and provides the necessary transparency by informing data subjects.

Definitions of the concepts and terms used within the scope of the Policy are provided in Annex 1.

1.2. Effectiveness and Amendment

This Policy has been published on the Company's website in order to be made available to the public. With respect to the Policy, the provisions of the legislation in force, primarily Law

No. 6698, shall prevail; in the event of any conflict between the Policy and the legislation, the provisions of the legislation shall take precedence.

The Company reserves the right to amend this Policy at any time in order to comply with changes in the relevant legislation. The most current version of the Policy can be accessed under the KVKK heading on the Company's official website at <https://www.ugurteneke.com.tr/>.

2. DATA SUBJECTS, PURPOSES OF DATA PROCESSING AND DATA CATEGORIES RELATED TO THE PERSONAL DATA PROCESSING ACTIVITIES CARRIED OUT BY OUR COMPANY

2.1. Data Subjects

The scope of this Policy covers all natural persons whose personal data are processed by the Company, other than Company employees. Accordingly, the categories of data subjects are set out in general terms below:

3

DATA CATEGORIES DESCRIPTION 1. Job Applicant Natural persons who apply for employment with the Company by sending a CV or through other means 2. Shareholder Natural persons who are shareholders/partners of the Company or natural persons who are members of the Company's Board of Directors 3. Intern Employees who legally undertake internships at the Company 4. Supplier Employee Employees of companies from which the Company procures products or services 5. Supplier Representative Representatives of companies from which the Company procures products or services 6. Visitor / Website Visitor Third parties entering the Company's premises, and persons visiting the Company's website 7. Customer Representative / Representatives of corporate customers or the individual customer Product or Service Recipient themselves 8. Customer Employee Natural persons whose personal data are obtained regardless of whether there is any contractual relationship with the Company, or employees of customers with whom a contractual relationship exists 9. Employee's Family Member Family members of Company employees 10. Third Party Natural persons other than the data subject categories listed above and Company employees

The data subject categories are presented for general informational purposes only. The fact that a natural person does not fall within these categories does not remove their status as a "data subject" under Law No. 6698.

2.2. Purposes of Personal Data Processing

The Company may process your personal data and special categories of personal data for the purposes set out below, in accordance with the data processing conditions stipulated in Law No. 6698 and the relevant legislation.

Conducting Organization and Event Management Activities Creating and Following Up Visitor Records Carrying Out Management Activities Providing Information to Authorized Persons, Institutions and Organizations Carrying Out Talent / Career Development Activities Carrying Out Investment Processes Ensuring the Security of Data Controller Operations Carrying Out Marketing Processes for Products / Services Implementing Remuneration Policy Ensuring the Security of Movable Property and Resources Following Up Requests /

Carrying Out Contract Processes Carrying Out Storage and Archiving Activities Carrying Out Risk Management Processes Carrying Out Performance Evaluation Processes Carrying Out Activities for Customer Satisfaction Carrying Out Customer Relationship Management Processes Carrying Out Goods / Service Production and Operation Processes Carrying Out Goods / Service Sales Processes Carrying Out After-Sales Support Services for Goods / Services Carrying Out Goods / Service Purchasing Processes Carrying Out Logistics Activities Carrying Out Business Continuity Activities Receiving and Evaluating Suggestions for Improving Business Processes Carrying Out Occupational Health / Safety Activities Carrying Out / Auditing Business Activities Planning Human Resources Processes Carrying Out Communication Activities Carrying Out Internal Audit / Investigation / Intelligence Activities Following Up and Conducting Legal Affairs Carrying Out Assignment Processes Ensuring Physical Space Security Carrying Out Processes for Loyalty to the Company / Products / Services Conducting Finance and Accounting Operations Carrying Out Activities in Compliance with Legislation Managing Access Authorizations Carrying Out Training Activities Carrying Out Audit / Ethics Activities Carrying Out Application Processes for Job Applicants Carrying Out Selection and Placement Processes for Job Applicants / Interns / Students Carrying Out Information Security Processes Carrying Out Emergency Management Processes

2.3. Activities Carried Out in Relation to the Processing of Personal Data

Information regarding the personal data processing activities carried out by the Company is presented below.

Within the scope of carrying out financial activities, personal data may be processed for the purpose of managing contract processes with banks, making payments, submitting KOSGEB (Small and Medium Enterprises Development Organization) incentive applications, and carrying out notification processes to TÜİK (Turkish Statistical Institute). Within the framework of accounting processes, personal data may be processed by our Company, and transferred to authorized persons, institutions and organizations where necessary, for purposes including: the preparation and submission of tax returns, the creation of current account records, the conduct of financial audits, the keeping of e-ledger records, bookkeeping transactions, the application of wage garnishment deductions, transactions before the Ministry of Industry, the preparation of capacity reports, the preservation of documents relating to company expenditures, the processing of credit card transactions and collection/payment vouchers, the keeping of payment records, transactions relating to representation documents such as signature circulars, powers of attorney and signature declarations, and the conduct of tax audit processes. Within the scope of carrying out sales processes, personal data are processed at the stages of creating current accounts for customers, obtaining information regarding customers and suppliers, carrying out price quotation preparation processes, submitting quotations, preparing order forms, and drafting sales contracts. Personal data may be processed during the conduct of logistics processes. Within the scope of purchasing activities, personal data may be processed, and transferred to relevant parties where necessary, at the stages of creating current accounts

for suppliers, signing delivery note documents, carrying out invoice receipt processes, maintaining communication with suppliers, conducting contract processes, obtaining order forms, filling out supplier information and evaluation forms, and carrying out quotation processes. Within the scope of board of directors activities, personal data of shareholders, board members and employees may be processed, and transferred to relevant institutions where necessary, during the conduct of general processes, the preparation of management activity reports, the preparation of general assembly meeting minutes, trade registry transactions, and the follow-up of signature circular and internal directive processes. Within the scope of Law No. 5651 on "Regulation of Publications on the Internet and Combating Crimes Committed through Such Publications," all data relating to communication, tracking of e-mail and internet traffic, and the content of e-mails may be processed by the Company. Personal data are processed through camera recordings made in indoor and outdoor areas via security cameras. Within the scope of occupational health and safety activities, personal data are processed in connection with reporting workplace accidents, conducting risk analyses, having visitors sign occupational health and safety (OHS) instruction forms, and maintaining workplace accident forms. Within the scope of administrative affairs activities, personal data relating to employees of subcontractors and contractors are processed. During the process of receiving job applications, personal data relating to candidates are processed. Within the framework of personnel affairs, personal data relating to an employee's family may also be processed during the creation of personnel files. Personal data of third parties are processed during the conduct of wage garnishment procedures, responding to questions relating to such procedures, and making payments.

6

For the purpose of conducting legal processes, personal data may be transferred, limited to such purposes, during the appointment of contracted attorneys and the transfer of information and documents. Personal data are processed during the processes of receiving and responding to data subject applications.

2.4. Personal Data Categories

Your personal data, classified into the categories set out below, are processed by our Company in accordance with the data processing conditions stipulated in Law No. 6698 and the relevant legislation.

PERSONAL DATA CATEGORY DESCRIPTION OF THE PERSONAL DATA CATEGORY

Identity Information relating to a person's identity found in documents such as driver's license, national ID card, residence certificate, passport, attorney's ID, marriage certificate, etc.: Name and surname, mother's/father's name, date of birth, place of birth, marital status, national ID card serial/sequence number, national identity number, license plate, title, etc. Contact Address number, e-mail address, contact address, registered electronic mail (KEP) address, telephone number, etc. Location Location/positioning information of the current location, etc. **Personnel Records** Personal data forming the basis of employees' personnel rights (any information and document required by law and workplace policy to be included in a personnel file): payroll information, disciplinary investigation records, entry-to-work document records, asset declaration information, CV information, performance evaluation reports, etc. **Legal Transaction** Information in correspondence with judicial authorities, information in case files, etc. **Customer Transaction** Invoice, promissory note, cheque information, information in bank receipts, order information, request information, etc.

Physical Space Security Entry-exit records of employees and visitors, camera recordings, etc. Transaction Security IP address information, website login/logout information, password and passcode information, etc. Risk Management Information processed for the management of commercial, technical and administrative risks, etc. Finance Information, documents and records reflecting any financial outcome created according to the type of legal relationship the Company has established with the data subject, including bank account information Professional Experience Data relating to the experience of individuals who have applied to become employees of our Company, or who have been evaluated as job candidates in line with our Company's human resources needs pursuant to commercial custom and principles of good faith, or who are or have been in a working relationship with our Company;

7

for example, diploma information, courses attended, in-service training information, certificates, transcript information Marketing Purchase history information, surveys, cookie records, information obtained through campaign activities, etc. Visual and Audio Records Visual and audio recordings, etc. Philosophical Belief, Religion, Information relating to other beliefs, information relating to religious Sect and Other Beliefs affiliation, information relating to philosophical belief, information relating to sectarian affiliation, etc. Dress and Appearance Information relating to dress and appearance, etc. Association Membership Association membership information, etc. Foundation Membership Foundation membership information, etc. Trade Union Membership Trade union membership information, etc. Health Information Information relating to disability status, blood type information, personal health information, information on devices used and prosthetics, etc. Criminal Conviction and Security Information relating to criminal convictions, information relating to Measures security measures, etc. Special Category Personal Data Data relating to a person's race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, dress and appearance, association, foundation or trade union membership, health, sexual life, criminal conviction and security measures constitute special categories of personal data. No special categories of personal data other than those listed above are processed.

3. PRINCIPLES AND CONDITIONS RELATING TO THE PROCESSING OF PERSONAL DATA

3.1. Principles Relating to the Processing of Personal Data

Our Company processes your personal data in accordance with the personal data processing principles set out in Article 4 of Law No. 6698, and compliance with these principles is mandatory in every data processing activity.

Processing of personal data in compliance with the law and the rules of good faith: The Company acts in compliance with the laws in force, secondary legislation and general legal principles when processing personal data; it processes data only to the extent limited by the purpose of processing and takes into account the reasonable expectations of data subjects. Ensuring that personal data are accurate and kept up to date: The accuracy and currency of processed personal data are regularly checked. Data subjects are granted the right to request the correction or erasure of inaccurate or outdated data.

Processing personal data for specific, explicit and legitimate purposes: The purposes are clearly determined prior to each data processing activity, and it is ensured that these purposes comply with the law. Ensuring that personal data are relevant, limited and proportionate to the purpose for which they are processed: The data processed are limited to those necessary to achieve the specified purposes; necessary measures are taken to prevent the processing of unnecessary data or data beyond the purpose. Retaining personal data for the period stipulated in the relevant legislation or required for the purpose of processing: When the purpose of data processing ends or the legal retention period expires, personal data are erased, destroyed or anonymized.

3.2. Conditions Relating to the Processing of Personal Data

Our Company processes your personal data provided that at least one of the personal data processing conditions set out in Article 5 of Law No. 6698 is satisfied. Explanations regarding these conditions are set out below:

Explicit consent of the data subject: In cases where none of the other data processing conditions apply, the Company processes your personal data based on the free will of the data subject, who has adequate and understandable knowledge about the data processing activities, in a manner that leaves no room for doubt, and limited solely to the specified purpose. Data processing expressly provided for by law: Where a personal data processing activity is expressly regulated under the relevant legislation, the Company may process personal data without the explicit consent of the data subject. In such cases, data processing is carried out in accordance with the relevant legal regulation. Factual impossibility and compulsory data processing: In cases where it is not possible to obtain the explicit consent of the data subject and the processing of personal data is compulsory — for example, the data of persons who are unable to express their consent due to factual impossibility, or who cannot give valid consent — such data may be processed for the purpose of protecting the life or physical integrity of such persons or another person. Data processing directly related to the establishment or performance of a contract: Where a personal data processing activity is directly required by a contract concluded, or to be concluded, between the data subject and the Company, the data belonging to the parties to the contract may be processed. Fulfillment of a legal obligation: As data controller, the Company is required to process personal data in order to fulfill its legal obligations arising from the legislation in force. Personal data made public by the data subject: Personal data that have been made public or disclosed by the data subject may be processed for the purpose of such disclosure, even without the explicit consent of the data subject. Establishment, exercise or protection of a right: Where the processing of personal data is compulsory for the establishment, exercise or protection of a right, the Company may process such data without the explicit consent of the data subject. Protection of legitimate interests: Provided that it does not harm the fundamental rights and freedoms of the data subject, the Company may process personal data for the purpose of its own legitimate interests. In such cases, the Company processes the data if, after weighing the interest arising from the processing activity against the possible effects on the rights and freedoms of the data subject, it concludes that the balance of interests has not been upset.

3.3. Conditions Relating to the Processing of Special Categories of Personal Data

Special categories of personal data are defined within a limited scope under Article 6 of the Law. These data include information relating to a person's race, ethnic origin, political opinion, philosophical and religious beliefs, sect or other beliefs, style of dress, association, foundation or trade union membership, health information, sexual life, criminal conviction and security measures, as well as biometric and genetic data.

9

The Company may process special categories of personal data by taking the additional measures determined by the Personal Data Protection Board and within the framework of the following conditions:

The second paragraph of Article 6 of Law No. 6698 on the Protection of Personal Data, dated 24 March 2016, has been repealed, and the third paragraph has been amended as set out below. Accordingly, as of 1 June 2024, special categories of personal data may be processed where:

The explicit consent of the data subject is obtained, It is expressly provided for by law, It is compulsory for the protection of the life or physical integrity of the data subject or another person, where the data subject is factually unable to give consent or where consent given by the data subject has no legal validity, It relates to personal data that have been made public by the data subject and is in accordance with the data subject's intention in disclosing such data, It is compulsory for the establishment, exercise or protection of a right, It is necessary, for persons subject to a duty of confidentiality or authorized institutions and organizations, for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, or the planning, management and financing of health services, It is compulsory for the fulfillment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance, It relates to current or former members, affiliates, or persons in regular contact with foundations, associations and other non-profit organizations or formations established for political, philosophical, religious or trade union purposes, provided that the processing is in accordance with the legislation to which they are subject and their purposes, is limited to their field of activity, and is not disclosed to third parties.

Prior to 1 June 2024, special categories of personal data were processed as follows:

Special categories of data other than health and sexual life were processed based on the explicit consent of the data subject, or where expressly provided for by law. Data relating to health and sexual life were processed, without seeking the explicit consent of the data subject, by persons under an obligation of confidentiality or authorized institutions and organizations, for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning, management and financing of health services.

For more detailed information on this matter, please refer to the "Policy on the Protection of Special Categories of Personal Data."

4. TRANSFER OF PERSONAL DATA

In accordance with Articles 8 and 9 of Law No. 6698 and the additional regulations determined by the Personal Data Protection Board, the Company may transfer personal data both domestically and abroad, provided that the conditions relating to the transfer of personal data are satisfied.

The transfer of personal data to third parties domestically is carried out provided that at least one of the data processing conditions set out in Articles 5 and 6 of the Law and explained in Section 3 of this Policy is satisfied, and that compliance with the data processing principles is ensured. The transfer of personal data abroad is possible, even in the absence of the explicit consent of the data subject, provided that at least one of the data processing conditions set out in Articles 5 and 6 of the Law and detailed in Section 3 of the Policy exists, and that the fundamental principles are complied with. In this regard, standard contracts have been signed with the relevant institutions and companies based on the standard contracts published on the official website of the Personal Data Protection Board, and have been submitted to the Board. Where the country to which the transfer will be made is not on the list of safe countries announced by the Personal Data Protection Board, personal data may be transferred to third parties abroad provided that the Company and the data controller in the relevant country undertake in writing to provide adequate protection, that the Board authorizes such processing, and that at least one of the data processing conditions set out in Articles 5 and 6 of the Law is satisfied.

10

In accordance with the general principles of the Law and the data processing conditions set out in Articles 8 and 9, the Company may transfer personal data to the parties categorized in the following table:

RECIPIENT PARTY CATEGORY	PURPOSE OF TRANSFER
Authorized Public Institutions and Organizations	Sharing of personal data limited to the purpose of responding to information requests from the relevant public institutions and organizations
Suppliers	Transfer of data limited to the extent necessary to obtain the service
Business Partners	Transfer of data limited to the extent necessary to provide the service
Shareholders	Sharing of data limited to the extent necessary within the scope of management authority
Natural Persons or Private Legal Entities	Transfer of data limited to the extent necessary to provide the service
Other – Authorized Civil Society Organizations	Sharing of personal data limited to the purpose of responding to information requests from the relevant civil society/trade union institutions and organizations
Abroad	Transfer of data for the purpose of conducting overseas sales and logistics activities
Publicly Accessible	Publicly accessible platforms such as the website

11

The Company carries out the transfer of data for the following purposes and based on the following legal grounds:

Purposes

Conducting Organization and Event Management Activities
Creating and Following Up Visitor Records
Carrying Out Management Activities
Providing Information to Authorized Persons, Institutions and Organizations
Carrying Out Talent / Career Development Activities
Carrying Out Investment Processes
Work and Residence Permit Procedures for Foreign

Personnel Ensuring the Security of Data Controller Operations Carrying Out Marketing Processes for Products / Services Implementing Remuneration Policy Ensuring the Security of Movable Property and Resources Following Up Requests / Complaints Carrying Out Strategic Planning Activities Carrying Out Contract Processes Carrying Out Storage and Archiving Activities Carrying Out Risk Management Processes Carrying Out Performance Evaluation Processes Carrying Out Activities for Customer Satisfaction Carrying Out Customer Relationship Management Processes Carrying Out Goods / Service Production and Operation Processes Carrying Out Goods / Service Sales Processes Carrying Out After-Sales Support Services for Goods / Services Carrying Out Goods / Service Purchasing Processes Carrying Out Logistics Activities Carrying Out Business Continuity Activities Receiving and Evaluating Suggestions for Improving Business Processes Carrying Out Occupational Health / Safety Activities Carrying Out / Auditing Business Activities Planning Human Resources Processes Carrying Out Communication Activities Carrying Out Internal Audit / Investigation / Intelligence Activities Following Up and Conducting Legal Affairs Carrying Out Assignment Processes Ensuring Physical Space Security Carrying Out Processes for Loyalty to the Company / Products / Services Conducting Finance and Accounting Operations Carrying Out Activities in Compliance with Legislation Managing Access Authorizations Carrying Out Training Activities Carrying Out Audit / Ethics Activities Carrying Out Fringe Benefits and Employee Benefits Processes Fulfilling Obligations Arising from Employment Contracts and Legislation for Employees Carrying Out Application Processes for Job Applicants Carrying Out Selection and Placement Processes for Job Applicants / Interns / Students Carrying Out Information Security Processes Carrying Out Emergency Management Processes

12

Legal Grounds

The personal data processing activity is expressly provided for by law The personal data processing activity is directly related to the establishment or performance of a contract It is compulsory for the data controller to carry out the personal data processing activity in order to fulfill its legal obligation It is compulsory to process personal data for the establishment, exercise or protection of a right It is compulsory to process data for the legitimate interests of the data controller, provided that this does not harm the fundamental rights and freedoms of the data subject

5. INFORMING DATA SUBJECTS AND THE RIGHTS OF DATA SUBJECTS

Pursuant to Article 10 of the Law, data subjects must be informed before or, at the latest, at the time personal data begins to be processed. As data controller, our Company has established the necessary internal structure in order to fulfill this obligation to inform. In this regard:

For the purposes of processing your personal data, please refer to Section 2.2 of the Policy; For the parties to whom your personal data are transferred and the purposes of such transfer, please refer to Section 4 of the Policy; For details on the conditions for processing your personal data collected through various channels in physical or electronic environments, please refer to Sections 3.2 and 3.3 of the Policy.

In addition, pursuant to Article 11 of the Law, as data subjects you have the following rights:

To learn whether your personal data are being processed; To request information regarding such processing, if any; To learn the purpose of processing your data and whether they are used in accordance with such purpose; To know the third parties to whom your personal data are transferred, domestically or abroad; To request the correction of your data if processed incompletely or incorrectly, and to request that such correction be notified to third parties to whom the data have been transferred; To request the erasure or destruction of your personal data once the reasons requiring their processing no longer exist, and to request that this be notified to the relevant third parties; To object to processing that produces a result against you through analysis exclusively by automated systems; To request compensation for damages in the event that you suffer damage due to unlawful processing of data.

You may submit your requests relating to these rights to our Company by filling out the "Data Subject Application Form" (KVKK Section – Data Subject Application Form) available at <https://www.ugurteneke.com.tr/>. Your applications will be concluded free of charge as soon as possible, and at the latest within thirty days, depending on the nature of the request. However, if the transaction requires a cost, a fee may be charged in accordance with the tariff to be determined by the Personal Data Protection Board.

During the evaluation of applications, the Company first determines whether the applicant is indeed the rightful data subject. Where deemed necessary, it may request additional and detailed information from the applicant in order to better understand the request.

The Company delivers its responses to data subject applications in writing or electronically. If an application is rejected, the reasons for rejection will be explained to the data subject clearly and in detail.

13

Where personal data are not obtained directly from the data subject, the Company ensures that data subjects are informed: (1) within a reasonable period after the data are obtained, (2) at the time of first contact, if the data will be used for communication purposes, or (3) at the time of the first transfer at the latest, if the data will be transferred to third parties.

6. ERASURE, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

Pursuant to Article 7 of the Law, even where personal data have been lawfully processed, when the reasons requiring their processing cease to exist, the Company erases, destroys or anonymizes the data, either on its own initiative or upon the request of the data subject, in accordance with the guidelines published by the Personal Data Protection Authority (Kurum).

7. LIMITATIONS ON THE SCOPE AND APPLICATION OF THE LAW

The following cases fall outside the scope of Law No. 6698:

The processing of personal data entirely by natural persons themselves or in connection with activities concerning family members living in the same household, provided that the

data are not disclosed to third parties and data security obligations are complied with;

The processing of personal data anonymized for the purposes of official statistics, research, planning and statistical purposes;

The processing of personal data within the framework of art, history, literature, scientific research or freedom of expression, provided that it does not harm national defense, national security, public security, public order, economic security, privacy of personal life or personal rights, and does not constitute a crime;

The processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law for the purpose of ensuring national defense, national security, public security, public order or economic security;

The processing of personal data by judicial authorities or enforcement authorities within the scope of investigation, prosecution, adjudication or execution processes.

In the following cases, the Company is not required to provide notice to data subjects, and data subjects may not exercise the other rights set out in the Law, other than their right to seek compensation for damages:

Where the processing of personal data is carried out for the prevention of a crime or for a criminal investigation;

The processing of personal data that has been made public by the data subject;

Where the processing of personal data is carried out by public institutions and organizations and professional organizations with the status of public institutions, which are duly authorized under the powers granted by law, for the purpose of supervision, regulation, disciplinary investigation or prosecution;

Where the processing of personal data is carried out for the purpose of protecting the state's economic and financial interests in relation to budgetary, tax and financial matters.

13

ANNEX 1: DEFINITIONS

Explicit Consent Application Form The application form to be submitted by the data subject (Personal Data Subject) to the data controller, prepared in accordance with Law No. 6698 on the Protection of Personal Data and the Communiqué on the Procedures and Principles Regarding Applications to the Data Controller issued by the Personal Data Protection Authority, containing the application to be made by personal data subjects in order to exercise their rights. **Related User Persons** who process personal data within the data controller's organization, or under the authority and instructions received from the data controller, excluding the person or unit responsible for the technical storage, protection and backup of the data. **Destruction** The erasure, destruction or anonymization of personal data. **Recording Medium** Any medium in which personal data processed wholly or partly by automated means, or by non-automated means provided that they form part of a data recording system, are kept. **Personal Data** Any information relating to an identified or identifiable natural person. **Processing of Personal Data** Any operation performed on personal data, whether wholly or partly by automated means, or by non-automated means

provided that they form part of a data recording system, such as collection, recording, storage, retention, alteration, reorganization, disclosure, transfer, acquisition, making available, classification or prevention of use. Anonymization of Personal Data Rendering personal data incapable, under any circumstances, of being associated with an identified or identifiable natural person, even when matched with other data. Personal Data Subject The natural person whose personal data are processed by or on behalf of UĞUR TENEKE AMBALAJ VE PLASTİK SANAYİ ANONİM ŞİRKETİ. Erasure of Personal Data Rendering personal data inaccessible and unusable in any way for Related Users. Destruction of Personal Data The process of rendering personal data inaccessible, irrecoverable, and unusable by anyone in any way. Board Personal Data Protection Board (Kişisel Verileri Koruma Kurulu) Authority Personal Data Protection Authority (Kişisel Verileri Koruma Kurumu)

13

Special Categories of Data relating to a person's race, ethnic origin, political opinion, Personal Data philosophical belief, religion, sect or other beliefs, dress and appearance, association, foundation or trade union membership, health, sexual life, criminal conviction and security measures, as well as biometric and genetic data. Periodic Destruction Where all of the conditions for processing personal data set out in the Law cease to exist, the erasure, destruction or anonymization process to be carried out ex officio, at recurring intervals specified in the personal data retention and destruction policy. Data Processor A natural or legal person who processes personal data on behalf of the data controller, based on the authority granted by the data controller.

ANNEX 2: DATA RECIPIENT GROUPS

Authorized Public Institutions Among public institutions and organizations legally authorized to and Organizations obtain information and documents from the Company: Notaries, public and private banks, provincial governorships, the Social Security Institution (SGK), the Ministry of Family and Social Services (ÇGSB), the Provincial Directorate of Industry and Trade, the Trade Registry Directorate, the Bursa Chamber of Commerce and Industry (BTSO), Chambers of Commerce and Industry (TSO) and other industrial zone directorates, the Turkish Standards Institute (TSE), KOSGEB (Small and Medium Enterprises Development Organization), TÜBİTAK (The Scientific and Technological Research Council of Turkey), the Ministry of Science, Industry and Technology, the Ministry of Economy, the Revenue Administration (GİB), the Occupational Health and Safety Information System (İBYS), law enforcement authorities, the Ministry of Finance, the Turkish Statistical Institute (TÜİK), Enforcement Directorates, Courts, and Relevant Ministries Suppliers Authorized visa company, insurance agency, attorney/consultant, technology consultant, private training institution, MYK (Vocational Qualifications Authority) authorized private training institution, financial advisory firm, bank, supplier companies Business Partners Companies with which business partnerships have been formed during certain periods Shareholders Natural persons who are shareholders/partners of the Company Natural Persons or Private Customers Legal Entities Other – Authorized Civil Trade union institutions Society Organizations