

**FORD OTOSAN**

**Personal Data Protection and Processing Policy**

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## 1. Purpose and Scope

This Personal Data Protection and Processing Policy ("Policy") is to determine the basic principles and principles regarding the compliance of Ford Otomotiv Sanayi A.Ş. and its subsidiaries (collectively referred to as "Ford Otosan") with the personal data protection regulations to which it is subject as an important part of its commitment to operate in accordance with the law. This Policy has been prepared by also considering the ethical principles of Ford Otosan's Main Shareholders.

All employees and executives of Ford Otosan are obliged to act in accordance with this Policy, which is an integral part of Ford Otosan Code of Conduct and Ethics. Business Partners are also expected to act in accordance with the rules and principles of this Policy to the extent that they are applicable to the relevant party and/or transactions.

## 2. Definitions

**"Main Shareholders"** Ford Otosan's main shareholders are Ford Motor Company and Koç Holding A.Ş.

**"Explicit Consent"** Consent related to a specific subject, based on information and expressed with a free will.

**"Anonymization"** Making personal data unrelated to an identified or identifiable natural person under any circumstances, even when by matching with the other data.

**"Data Subject"** A real person of whom personal data are processed.

**"Business Partners"** Suppliers, vendors, authorized service companies, all kinds of representatives, subcontractors and consultancies acting on in the name of and on behalf of the company.

**"Personal Data"** Any information related with an identified or identifiable real person.

**"Processing of Personal Data"** Any activity performed on data such as obtaining personal data by fully or partially automatic means or non-automatic means that are part of a data registration, system; recording, storage, retention, revision, modification, disclosure, transfer, receiving of data, rendering the data obtainable or classification or prevention of use.

**"Koç Group"** Refers to all companies controlled directly by Koç Holding A.Ş., individually or jointly and the joint ventures included in the consolidated financial report of Koç Holding A.Ş.

**"Ford Otosan Personal Data Protection Committee / KVK Committee"** is the Committee established to (i) carry out the necessary KVK studies and establish the infrastructure throughout Ford Otosan, (ii) create Company Documents, (iii) establish and operate the appropriate governance structure, including training, supervision, audit and reporting activities, and (iv) ensure full compliance with the Law and the relevant legislation, chaired by Ford Otosan Digital Products and Services Leader and composed of designated representatives of all units, and convenes at regular intervals.

**"Legislation"** Law No. 6698 on the Protection of Personal Data and the EU General Data Protection Regulation (GDPR) in particular, all applicable personal data protection regulations to which Ford Otosan is subject regarding the protection of personal data.

**"Special Categories of Personal Data"** Race, ethnic origin, political view, philosophical belief, religion, religious sect or other beliefs, clothing style, association, foundation or union membership, health, sexual life, criminal convictions, and security measures as well as biometric and genetic data are special categories of personal data.

**"VERBİS"** Data Controllers Registry Information System.

**"Data Processor"** A real or legal person that processes personal data for and on behalf of the data controller based on the authorization granted by the data controller.

**"Data Controller"** A real or legal person who determines the objectives and means of personal data processing and is responsible for the establishment and management of the data recording system.

### **3. Principles Regarding the Processing of Personal Data**

Breach of this Policy may result in significant consequences for Ford Otosan, its associated executives and employees including legal, administrative, and criminal penalties based on the Legislation in the region of operation, and, most significantly, the breach may result in serious harm to the reputation of Ford Otosan.

One of the most important issues for Ford Otosan is to act in accordance with the Legislation and the general principles set out in the Legislation with regards to processing of personal data. In this regard, Ford Otosan is expected to follow the guidelines outlined below when processing personal data in compliance with the Legislation.

### **4. Processing of Personal Data in Compliance with the Principles Stipulated in the Legislation**

#### **4.1. Processing of personal data in accordance with the law and principle of good faith**

The general rule of trust and good faith in compliance with the Legislation must be adhered to on the subject of personal data processing. In this context, personal data should be processed in accordance with general principles of law, good-will and general morality to the extent required by business activities and limited to the these activities.

#### **4.2. Ensuring that personal data is accurate and up-to-date when required**

Systems must be established, and necessary measures must be taken to ensure that the personal data being processed are accurate and up-to-date while taking account of data subjects' rights.

#### **4.3. Processing of personal data for specific, explicit and legitimate purposes**

Personal data must be processed for legitimate and lawful purposes. Ford Otosan must only process personal data in connection with their activities and to the extent necessary. Prior to personal data processing operations, the purposes for processing personal data should be determined.

#### **4.4. Being limited, proportionate and relevant to the purpose of processing**

Personal data must be processed adequately for carrying out the determined purposes and processing of personal data that is not necessary for fulfilling the purposes must be avoided.

#### **4.5. Storing for the Period Stipulated in the Relevant Legislation or the Period Required for the Processing Purpose**

Personal data must only be stored for the period stipulated in the relevant Legislation or for the period required for the personal data processing purpose. In this regard, firstly determination must be made whether a certain period is stipulated for the storage of personal data in the relevant Legislation, if any period is determined, this period should be complied with.. If no period is determined, personal data must be stored for the period required for carrying out the purpose of the processing. Personal data must be erased, destructed, or anonymized in case the period expires or the reason for its processing no longer exists. Personal data must not be stored based on the possibility of future use.

### **5. Processing Personal Data Based on the Data Processing Conditions**

#### **5.1. Execution of Personal Data Processing Activities Based on the Personal Data Processing Conditions Specified in the Legislation**

As a rule, personal data must be processed based on at least one of the conditions specified in the Legislation. Determination should be made on whether the personal data processing activities carried out by the company's business units are based on at least one of the conditions. Personal data processing activities that do not meet this requirement should not be included in the processes.

## 5.2. Execution of Special Categories of Personal Data Processing Activities Based on Special Categories of Personal Data Processing Conditions Stipulated in the Legislation

As a rule, special categories of personal data must be processed based on the conditions specified in the Legislation. It must be ensured that the special categories of personal data processing activities carried out by the company's business units are in line with these conditions, the necessary technical and administrative measures for the processing of the special categories of personal data must be taken and it must be ensured that the following conditions are met:

- (i) **Special categories of personal data excluding health and sexual life** can be processed without the explicit consent of data subjects if it is explicitly stipulated in the laws, in other words, if there is an explicit provision in the relevant law regarding the processing of personal data. Otherwise, explicit consent of the data subject should be obtained.
- (ii) **Special categories of personal data regarding health and sexual life** can be processed without the explicit consent of data subjects for the purposes of the protection of public health, carrying out preventive medicine, medical diagnosis, treatment and care services, planning of financing and management of health services by the persons who are bound with professional secrecy or legally authorized authorities and institutions. Otherwise, explicit consent of the data subject should be obtained.

Processing of special categories of personal data must be carried out in accordance with the provisions set out in the Legislation regarding the processing of special categories of personal data and transfer of data to domestic third parties and abroad. In addition to the above-mentioned matters, in these cases, personal data processing activities must also be carried out by fulfilling the special requirements set forth in the Legislation.

## 6. Requirements to be Complied with for Transfer of Personal Data

Personal data of data subjects should be transferred to third parties in accordance with the purposes and legal basis for personal data processing and by taking the necessary security measures. In this regard, necessary processes for acting in accordance with the conditions stipulated in the Legislation must be designed.

## 7. Obligations Related to the Protection and Processing of Personal Data

### 7.1. Obligation to Register with VERBİS

If there is an obligation to register with VERBİS and/or a registry in the relevant country according to the criteria specified in the legislation, all necessary registrations must be made as Data Controller. In case of a revision in the registered information, the information in VERBİS must be updated within seven days from the date of revision.

Legal and Compliance Leadership must be informed twice a year, every 6-month periods (June-December) regarding the updates made by Ford Otosan in VERBİS.

### 7.2. Obligation to Inform Data Subjects

Data subjects must be informed at the time of collection of personal data in accordance with the Legislation. In this

regard, the personal data collection channels must be determined for the fulfillment of the obligation to inform; data subjects must be informed through the privacy notices which comply with the scope and conditions specific to these collection activities required in the Legislation; the appropriate processes should be designed accordingly by Ford Otosan.

Ford Otosan must keep the personal data collection channels up to date as a list.

### **7.3. Obligation to Ensure the Security of Personal Data**

Along with the awareness on the importance of ensuring data security in all aspects within Ford Otosan, necessary and adequate technical and administrative measures must be taken to prevent unlawful processing of personal data or access to data, and to store data in accordance with the Legislation and in this regard necessary audits must be conducted by the company and/or have audits conducted by a third party.

### **7.4. Audit of the Measures Taken for the Protection of Personal Data**

Systems for conducting and having the necessary audits regarding the functioning of the measures taken in terms of technical and administrative measures must be built. These audit results must be reported to the KVK Committee, Legal and Compliance Leadership, Digital Products and Services Leadership and the necessary actions must be taken to improve the measures taken.

### **7.5. Measures to be Taken in Case of Unauthorized Disclosure of Personal Data**

The data subject and the relevant authorities must be informed as soon as possible in compliance with the Legislation in case the processed personal data is illegally obtained by third parties. In this context, KVK Committee Legal and Compliance Leadership and Digital Products and Services Leadership must be informed immediately.

### **7.6. Obligation to Inform the Data Subject**

The data subjects have the right to request information about their processed personal data by applying data controllers whenever they need.

In this context, the necessary procedures and processes must be established and implemented within the company in the matters of designing the necessary application channels in accordance with the Legislation, evaluating the applications, answering the applications within the periods stipulated in the Legislation in order to evaluate the rights of the data subjects and to provide the necessary information to the data subjects.

In the case that the data subjects submit their requests regarding their rights to the company, the relevant request must be responded as soon as possible and within thirty days at the latest. While concluding the relevant application of the data subject, information shall be provided with a wording and format easily understandable to the data subject. Necessary warnings should be given within the company and awareness must be ensured that data subjects have a right to complain to the relevant authority in the case that the data subject's application is rejected, the response is insufficient, or the application is not responded within the stipulated timeframe.

Data subject applications and the response processes should be kept as a list by Ford Otosan and must be shared with Legal and Compliance Leadership twice a year at 6-month periods (June-December).

In addition, the opinions of the Legal and Compliance Leadership and Digital Products and Services Leadership must be taken before any action is taken regarding all kinds of information and document requests from the relevant authorities to the company and all kinds of applications to be made by the company to these authorities.

## 8. Authority and Responsibilities

When necessary, reports are made to the Main Shareholders regarding the measures taken and audits conducted for the implementation of this Policy.

All Ford Otosan employees and executives are responsible to comply with this Policy and Implementing and supporting Ford Otosan's relevant procedures and controls in line with the requirements in this Policy. Ford Otosan expects its Business Partners to comply with this Policy to the extent applicable to the relevant party and operation and takes necessary steps for this.

In case there is a difference between this Policy and the local legislation applicable in the countries where Ford Otosan operates, the more restrictive of the Policy or the legislation shall prevail to the extent that the relevant practice does not contradict the local legislation.

The "Ford Otosan Personal Data Protection Committee" has been established under the chairmanship of the Digital Products and Services Leader, who has been appointed as the Company's Personal Data Operations Officer, to ensure the enforcement of this Policy within the Company. The working principles of this Committee are made available to our Company employees with GDDBT-001-1 Personal Data Protection Committee Working Principles.

In case of being aware of any action that is thought to be contrary to this Policy, applicable legislation or Ford Otosan Code of Conduct and Ethics, the Human Resources Leader, Ford Otosan Ethics Representatives (Human Resources Leaders at Company locations and Ethics Coordinator employed by the Internal Audit Leadership), Legal and Compliance Leader or Internal Audit Leader should be contacted.

You can also submit your questions or all your notifications regarding ethical violations by calling "0850 305 50 10", sending an e-mail to [fordotosan.ethicspoint.com](mailto:fordotosan.ethicspoint.com) or [fordotosanmobile.ethicspoint.com](mailto:fordotosanmobile.ethicspoint.com) or via Ford Otosan Ethics Notification Channels via <https://www.fordotosan.com.tr/tr/kurumsal/ford-otosan-hakkinda/etik> or via Koç Holding Ethics Line "koc.com.tr/ihbarbildirim" or Ford Motor Company [SpeakUp@ford.com](mailto:SpeakUp@ford.com).

Ford Otosan employees may consult Ford Otosan Legal and Compliance Leadership about their questions about this Policy and its implementation.

Breach of this Policy by an employee might result in significant disciplinary penalties including dismissal. In the case of breach of this Policy by any third party expected to act in compliance with this Policy acts in violation of this Policy, all necessary legal actions may be taken, including the termination of the relevant contracts and the collection of the damages incurred by Ford Otosan from those responsible.

## 9. Revision History

This Policy was put into effect on October 7, 2016 by publishing it on [www.fordotosan.com.tr](http://www.fordotosan.com.tr) and announcing it within the Company, and was updated with the Board of Directors Decisions No. 2017/14 dated July 26, 2017 and No. 2023/33 dated October 16, 2023. Ford Otosan Legal and Compliance Leadership is responsible for updating the Policy and Ford Otosan Personal Data Protection Committee is responsible for its implementation.