



**FORD OTOMOTİV SANAYİ A.Ş.
POLICY ON THE PROTECTION AND
PROCESSING OF PERSONAL DATA**

July 26, 2017

FORD OTOMOTİV SANAYİ A.Ş.
POLICY ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

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1. INTRODUCTION

1.1. INTRODUCTION TO POLICY

Protection of personal data is among our Company's most important priorities. The most important pillar of this subject however is the protection and processing of data belonging to our potential customers, our Employee Candidates, company shareholders, company officials, our visitors; employees, shareholders and officials of institutions we are in cooperation with and third persons, such protection and processing of which is regulated by this Policy. Activities undertaken by our Company regarding the protection of our employees' personal data are managed by the **Policy on Protection and Processing of Personal Data of Ford Otomotiv Sanayi A.Ş. Employees** prepared in line with the principles of this Policy.

According to the Turkish Constitution, everyone has the right to request the protection of their personal data. Concerning the protection of personal data being a Constitutional right, Ford Otosan shows great effort for the protection of personal data belonging to customers, potential customers, employee candidates, company shareholders, company officials, visitors, employees, shareholders and officials of institutions we are in cooperation with, such protection and processing being managed by this Policy and implements such protection and processing of aforementioned data as a Company policy.

Within this scope, necessary administrative and technical measures are taken by Ford Otosan for the protection of personal data processed in accordance with the relevant legislation.

Within this Policy detailed explanations shall be provided concerning basic principles Ford Otosan has adopted for the processing of personal data and listed below:

- Processing of personal data in accordance with laws and in good faith,
- Personal data are accurate and up to date when necessary,
- Processing personal data for specified, clear and legitimate purposes,
- Processing personal data in connection with purposes for which they are processed with restrictions and purposes,
- Retaining personal data for terms foreseen by relevant legislation or for purposes they are processed for,
- Notifying and informing data subjects,
- Establishing the required system for the exercising of data subjects' rights,
- Taking necessary measures for the protection of personal data,
- Acting in compliance with relevant legislation and regulations of the Board when transferring personal data to the third parties in line with requirements of processing such personal data,
- Showing required sensitivity for the processing and protection of special categories of personal data.

1.2. THE PURPOSE OF POLICY

The main purpose of this Policy is to provide explanations regarding systems adopted for the protection of personal data and personal data processing activities undertaken by Ford Otosan in accordance with the law; to ensure transparency by informing people the personal data of whom are processed, such people foremost being our customers, our potential customers, our company shareholders, our

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company officials, the employees, shareholder and officials of institutions we are in cooperation with and third parties.

1.3. SCOPE

This Policy concerns all personal data belonging to our customers, our potential customers, our employee candidates, our company shareholders, company officials, our visitors; employees, shareholders and officials of institutions we are in cooperation with as well as third parties such data being processed by automatic means or by non-automatic means provided that they are a part of a data recording system.

This Policy may be applied to personal data subjects under the above mentioned categories entirely or in part (for example our active customers being our visitors at the same time) but also partial provisions thereof (for example such as our Visitors Only).

1.4. THE IMPLEMENTATION OF POLICY AND RELEVANT LEGISLATION

Relevant legal regulations in force concerning the processing and protection of personal data shall primarily be applied. In case there is a conflict between the legislation in force and this Policy, our Company accepts that the legislation in force shall be applied.

The Policy is comprised of rules set forth under the relevant legislation by embodying such rules within scope of Ford Otosan applications. Our Company continues the preparations for the required system and for acting in compliance with implementation periods foreseen by the Law no. 6698 (See. Annex-2)

1.5. EXECUTION OF POLICY

The Policy which is executed by Ford Otosan and has entered into force on **October 07, 2016** is renewed on July 26, 2017. The Policy is published on our Company's web site (www.fordotosan.com.tr) and is also forwarded to data subjects upon their request. Ford Otosan Committee for the Protection of Personal Data is responsible for the implementation of this Policy throughout the Company.

2. MATTERS CONCERNING THE PROTECTION OF PERSONAL DATA

Our Company, in compliance with Article 12 of the Law no. 6698, takes necessary technical and administrative measures for preventing unlawful access to data that are being processed and for ensuring the appropriate level of security for the retainment of data and in this regard, conducts necessary controls or have them conducted.

2.1. ENSURING SECURITY OF PERSONAL DATA

2.1.1. Technical and Administrative Measures Taken to Ensure the Lawful Processing of Personal Data

Technical and administrative measures are taken for ensuring the lawful processing of personal data according to the technological conditions and implementation costs.

(i) Technical Measures Taken for Ensuring Lawful Processing of Personal Data

Main technical measures taken by our Company for ensuring that personal data are processed lawfully are listed below:

- Personal data processing activities realized within our Company are controlled by established technical systems.
- Technical measures taken are periodically reported to the concerned person as per requirements of internal control mechanism.
- Personnel trained on technical matters are employed.

(ii) Administrative Measures Taken to Ensure the Lawful Processing of Personal Data

Main administrative measures taken by our Company for ensuring that personal data are processed lawfully are listed below:

- Employees are informed and trained regarding the protecting personal data and lawful processing of personal data.
- All activities pursued by our Company are analyzed in detail specific to all departments, personal data processing activities are set forth specific to the commercial activities realized by the relevant business units.
- Personal data processing activities carried out by our business units are set forth specific to the detailed activity carried out by such business unit with respect to the requirements to be met in order to ensure that such activities are in compliance with the Law no. 6698.
- In order to comply with the legal requirements determined based on our business units, awareness is raised specific to relevant business units and implementation rules are determined; necessary administrative measures are implemented by way of in-Company policies and trainings in order to ensure the supervision of these matters and the sustainability of implementation.
- Contracts and documents regulating the legal relationship between our Company and employees, apart from exceptions introduced by Company instructions and law which are subject to obligations not to process, disclose and use personal data and employees' awareness are raised in this respect and controls are conducted.

2.1.2. Technical and Administrative Measures Taken to Prevent Unlawful Access to Personal Data

In order to prevent the unauthorized or neglected disclosure of, access to and transfer of or any and all other unauthorized access to personal data, our Company takes technical and administrative measures according to the nature of the data to be protected, technological conditions and application costs.

(i) Technical Measures Taken to Prevent Unlawful Access to Personal Data

Main technical measures taken by our Company to prevent unlawful access to personal data are listed below:

- Technical measures in accordance with technological developments, are taken and such measures are periodically updated and renewed.
- Access and authorization technical solutions are taken into action in accordance with legal compliance determined as based on business units,
- Technical precautions taken are periodically reported to the concerned person as per requirements of internal control mechanism and matters which pose a risk are reevaluated and necessary technological solutions are produced.
- Virus protection systems and security wall software and hardware are installed.
- Personnel trained on technical matters are employed.

(ii) Administrative Measures Taken to Prevent Unlawful Access to Personal Data

Main administrative measures taken by our Company to prevent unlawful access to personal data are listed below:

- Employees are trained regarding the technical measures for preventing unlawful access to personal data.
- Access to personal data and authorization processes are designed and applied within Company structure in accordance with legal compliance requirements based on business units
- Employees are informed that they cannot disclose personal data they learn against the provisions of the Law no. 6698 and use such data for purposes other than such purposes they were processed for and that his aforementioned obligations shall remain after they leave office; moreover necessary undertakings are obtained from them in line therewith.
- Provisions ensuring that necessary security measures for the protection of personal data are taken by the persons to whom personal data is transferred and that they shall ensure compliance with such measures within their institutions are included into the contracts concluded with persons to whom personal data are lawfully transferred.

2.1.3. The Retainment of Personal Data in Secured Environments

Our Company takes necessary technical and administrative measures in accordance with the technological conditions and application costs in order to ensure the secure retainment of personal data and to prevent the loss, alteration or unlawful destruction.

(i) Technical Measures Taken for Retaining Personal Data in Secured Environments

Technical measures taken by our Company for the protection of personal data in secured environments are listed below:

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- Systems appropriate for technological developments are used for retaining personal data in secured environments,
- Expert personnel are employed on technical matters.
- Technical security systems for retainment areas are established, technical precautions that are taken are periodically reported to the concerned as per internal control mechanism, matters posing a risk are reevaluated and necessary technological solutions are produced.
- Appropriate backup programs are used in order to ensure that personal data are retained securely.

(ii) Administrative Measures Taken for Retaining Personal Data in Secured Environments

Main administrative measures for retaining personal data in secured environments are listed below:

- Employees are trained on the secure retainment of personal data.
- In the event that our Company outsources services due to technical requirements on the retainment of personal data, provisions ensuring that necessary security measures for the protection of personal data are taken by the persons to whom personal data is transferred and that they shall ensure compliance with such measures within their institutions are included into the contracts concluded with institutions to which personal data are lawfully transferred.

2.1.4. Auditing the Measures Taken for the Protection of Personal Data

Our Company, in accordance with Article 12 of the Law no. 6698, undertakes audits or has them undertaken by way of necessary periodical and sampling methods within its own structure with IT Auditing, Compliance, Risk Management and Internal Auditing Directorate. Results of such audit are reported to the Personal Data Protection Committee within the scope of Company's internal functioning, while any determined non-conformities are reported to the Extraordinary Status Committee and to the department relevant with the subject while necessary activities for the improvement of measures are taken. The Committee Responsible for Auditing is informed of the audit results undertaken and in cases where risk management measures require, information is provided to Early Determination of Risk and Management Committee and the Board of Directors of the Company is informed through these Committees.

2.1.5. Measures Taken in the Event of Unauthorized Disclosure of Personal Data

Our Company operates a system which ensures that the data subject and the Board is notified as soon as possible in the event that personal data which are processed in accordance with Article 12 of the Law no. 6698.

In case it is deemed necessary by the Board, this may be announced on the web site of the Board or by other means.

2.2. RESPECTING THE RIGHTS OF DATA SUBJECTS; CREATING MEANS FOR THE REFERRAL OF SUCH RIGHTS TO OUR COMPANY AND THE EVALUATION OF DATA SUBJECTS' REQUESTS

In order to evaluate the rights of personal data subjects and providing necessary information to personal data subjects our Company conducts, in compliance with Article 13 of the Law no. 6698, necessary means, internal operation, administrative and technical regulations.

Detailed information on the rights of personal data subjects are provided under Section 10 of this Policy.

2.3. PROTECTION OF SPECIAL CATEGORIES OF PERSONAL DATA

The Law no. 6698 emphasizes significance on special categories of personal data since unlawful processing of such data may cause the data subject to suffer or be discriminated.

Such data are; race, ethnicity, political views, philosophical beliefs, religion, sect or other beliefs, clothes and attire, association, foundation or syndicate membership, and data relating to health and sexual life, criminal convictions and security measures, biometric and genetic data.

Our Company acts with prudence on the protection of personal data deemed as “special category” as per the Law no. 6698 and such data being processed in accordance with the law. Within this scope, technical and administrative measures taken by our Company for the protection of personal data are applied elaborately with respect to special categories of personal data and necessary audits are conducted within Ford Otosan.

Detailed information regarding the processing of special categories of personal data is provided under Section 3 of this Policy.

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

Our Company provides necessary information and trainings to business units for preventing unlawful processing of personal data and raising awareness for ensuring the retention of such data.

Necessary orientation training systems for raising awareness on the protection of Ford Otosan’s current employees’ personal data and personal data of employees who are newly introduced to the business unit. By arrangements made on the Company Employee Principles, necessary information and undertakings are granted to our employees, sustainability of the annual electronic review of Employee Principles and test procedures is ensured.

Training attendance records are reported to relevant committees. In this regard our Company evaluates the attendance to relevant trainings, seminars and information sessions, conducts necessary audits or has such audits conducted. In line with the amendments of the relevant legislation, our Company updates and renews its training programs.

2.5. RAISING AWARENESS OF BUSINESS PARTNERS AND SUPPLIERS ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

Our Company regularly informs its business partners for raising awareness in order to prevent the unlawful processing of personal data preventing the unauthorized access to data and ensuring the retainment of data.

3. MATTERS CONCERNING THE PROCESSING OF PERSONAL DATA

In accordance with Article 20 of the Constitution and Article 4 of the Law no. 6698, our Company carries out personal data processing activities lawfully and in good faith; and ensures that processed personal data are accurate and up-to-date, by pursuing with specific, explicit and legitimate purposes relevant, limited and proportional to the purposes of processing. Our Company retains personal data for as long as foreseen by laws or necessary for the purposes of processing personal data.

As per requirements of Article 20 of the Constitution and Article 5 of the Law no. 6698 our Company processes personal data based on one or more of the conditions set forth under Article 5 of the Law no. 6698 concerning the processing of personal data.

In accordance with Article 10 of the Law no. 6698 and Article 20 of the Constitution our Company informs data subjects and provides the necessary information in case requested by data subjects.

Our Company complies with the provisions set forth under Article 6 of the Law no. 6698 with respect to the processing or special categories of personal data.

Our Company complies with the regulations set forth by Articles 8 and 9 of the Law no. 6698 and by the Board relating to the transfer of personal data.

3.1. THE PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH THE PRINCIPLES FORESEEN BY THE LEGISLATION

3.1.1. Processing in Good Faith and in Accordance with the Law

Personal data are processed in accordance with the principles set forth under legal regulations and general confidence rules and in good faith. In this regard, personal data are processed limited with and in proportion to the purpose of processing.

3.1.2. Ensuring that Personal Data Are Accurate and Up-to-Date When Necessary

By taking employees' fundamental rights and its own legitimate interests into consideration, our Company ensures that processed personal data are accurate and up-to-date and necessary measures are taken in this regard. For example; Ford Otosan has established a system for data subjects to correct their personal data and verify their accuracy. Detailed information regarding such subject is provided under Section 10 of this Policy.

3.1.3. Processing for Specific, Explicit and Legitimate Purposes

Our Company determines lawful and legitimate processing purpose of personal data expressly and definitely. Our Company processes personal data in connection with the goods and services it provides and to the extent that is necessary for them. Purposes of processing personal data are set forth prior to the beginning of the data processing.

3.1.4. Relevant, Limited and Proportional to the Purposes for Which They Are Processed

Personal data are processed for the realization of the specified purposes and processing of personal data that is irrelevant to the realization of the purpose or that are not required is prevented. For example, personal data processing activity for meeting the needs that may arise in the future are not carried out.

3.1.5. Retaining for a Duration Necessary for the Purposes for Which the Data Are Processed or a Duration Foreseen Under the Relevant Legislation

Our Company keeps personal data only for a duration stated under the applicable legislation or necessary for the purposes for which the data are processed. In this regard, first it is determined that whether a duration is foreseen under the relevant legislation and if so such duration is complied with, if not, personal data are kept for the duration necessary for the purposes for which data are processed. In the event that the duration is expired or the data is no longer necessary in relation to the purpose for which the personal data was collected, unless there is a legal reason that permits for a longer duration of retention, personal data are deleted, destroyed or anonymized pursuant to the policy principles implemented by our Company in this regard.

3.2. THE PROCESSING OF PERSONAL DATA BASED ON AND LIMITED TO ONE OR MORE CONDITIONS REGARDING THE PROCESSING OF PERSONAL DATA STATED UNDER ARTICLE 5 OF THE LAW NO. 6698

Our Company, in line with legislation provisions, processes personal data only under circumstances foreseen by the laws or where explicit consent of the data subject is provided. Detailed information regarding this subject is provided under Section 7 of this Policy.

3.3. INFORMING AND NOTIFYING THE DATA SUBJECT

In accordance with Article 10 of the Law no. 6698, our Company informs data subjects during the collection of personal data. Within this scope, Ford Otosan provides the information on the Company and of its representative, if any, the purpose of the personal data processing for which the data are intended, the recipients to whom the personal data will be transferred, and purposes of such transfer, the method and legal grounds of the personal data collection and rights of the data subjects are provided. Detailed information regarding this subject is provided under Section 10 of this Policy.

In case data subjects request information regarding their personal data in accordance with Article 10 of the Law no. 6698, our Company provides the necessary information. Detailed information regarding this matter is provided under Section 10 of this Policy.

3.4. THE PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA

When processing personal data is deemed as “special category” as per the Law no. 6698 our Company carefully complies with the regulations provided under the Law no. 6698.

According to Article 6 of the Law no. 6698 certain personal data are qualified as “special categories of personal data” due to the reason that their unlawful processing may cause the data subject to suffer or be discriminated. Such data are; race, ethnicity, political views, philosophical beliefs, religion, sect or other beliefs, clothes and attire, association, foundation or syndicate membership, data relating to health and sexual life, criminal convictions and security measures, biometric and genetic data.

Special categories of personal data may be processed under the below mentioned circumstances in accordance with the Law no. 6698 and provided that necessary measures specified by the Board are taken:

- If the employee has explicitly consented or
- If the employee has not explicitly consented;

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- Special categories of personal data other than data relating to health and sex life of the employee are processed where it is specifically envisaged under the laws,
- Special categories of personal data relating to the health and sex life of the employee may be transferred to persons under the obligation of confidentiality or authorized institutions and organizations only for the purposes of protection of public health, preventive medicine, medical diagnosis, conducting of nursing services, planning of the health services and financing.

3.5. THE TRANSFER OF PERSONAL DATA

By taking necessary security measures in line with the lawful personal data processing purposes (See Section II/ Title 1) our Company may transfer data subjects' personal data and special categories of personal data to data subject third persons (to third person companies, group companies, real third persons). In this regard, our Company complies with the regulations provided under Article 8 of the Law no. 6698. Detailed information regarding this subject is provided under Section 6 of this Policy.

3.5.1. Transfer of Personal Data

In line with legitimate and lawful personal data processing purposes, our Company may transfer personal data to third parties based on and limited to one or more of the personal data processing conditions stated under Article 5 of the Law no. 6698. Detailed information regarding these circumstances are provided under Section 7.1. of this Policy.

3.5.2. Transfer of Special Categories of Personal Data

By acting carefully and taking the necessary security measures (see Section 2/Title 2.1.) as well as taking adequate measures foreseen by the Board, our Company, in line with legitimate lawful personal data processing purposes, may transfer data subjects' special categories of personal data to the third parties only under circumstances foreseen by Law no. 6698 or where the data subject has explicitly consented.

- If the employee has explicitly consented or
- If the employee has not explicitly consented;
 - Special categories of personal data other than data relating to health and sex life of the employee (*Data relating to an individual's racial or ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs; dress and appearance; memberships to any association, foundation or trade union; criminal conviction and security measures and biometric data and genetic data*) are processed where it is specifically envisaged under the laws,
 - Special categories of personal data relating to the health and sex life of the employee may only be processed by persons under the obligation of confidentiality or authorized institutions and organizations only for the purposes of protection of public health, preventive medicine, medical diagnosis, conducting of nursing services, planning of the health services and financing.

3.6. TRANSFER OF PERSONAL DATA TO ABROAD

By taking necessary security measures (See Section 2/Title 2.1) and in line with legitimate and lawful personal data processing purposes, our Company may transfer data subjects' special categories of personal data (also by taking the measures foreseen by the Board) to third persons located abroad.

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Personal data are transferred by our Company to foreign countries where it is deemed by the Board that adequate protection is provided in this country (“Foreign Country with Sufficient Protection”) or to foreign countries where adequate protection is not provided and on the condition that the Board gives permission and the data controllers both in Turkey and in the country to which data is transferred, undertake to provide sufficient protection in writing (“Foreign Country Where the Data Controller Undertakes to Provide Adequate Protection”). In this regard, our Company complies with the regulations provided under Article 9 of Law no. 6698. Detailed information regarding this subject is provided under Section 6 of this Policy.

Detailed information regarding circumstances where the transfer of personal data to abroad is permitted, are provided under Section 7 of this Policy.

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

Within the scope of obligation of providing information, our Company notifies the data subject regarding which personal data of which data subjects' groups are processed, purposes of processing the personal data of the data subject and retention periods.

4.1. CATEGORIZATION OF PERSONAL DATA

By informing the relevant parties in accordance with Article 10 of the Law, in line with the lawful and legitimate processing purposes of our Company based on and limited to one or more than one of the conditions for data processing set forth under Article 5 of the Law no. 6698, below mentioned categories of personal data are processed in accordance with the principles based on Article 4 of the Law no. 6698 and other general principles and obligations provided under the Law and limited to the subjects specified under this Policy. With whom personal data processed under such categories are related to specified under Section 5 of this Policy herein.

CATEGORIZATION OF PERSONAL DATA ¹	EXPLANATION OF PERSONAL DATA CATEGORIZATION
Identity Information	All information provided on the documents such as Driver's Licence, Identity Document, Residency, Passport, Advocate Identity, Marriage Records
Contact Information	Information such as phone number, address and e-mail
Location Data	Information locating the location of the vehicles and devices of the Company that are used by our employees or by the employees of institutions that we are in cooperation with
Customer Information	Information obtained and generated as a result of the operations conducted by our business units for our business operations
Information on Family Members and Relatives	Information relating to the family member and relatives of the data subject that are processed for the purposes of protecting the legal interests of the Company and the data subject
Customer Process Information	Information such as records of the use of goods and services and instructions and requests necessary for customer's use of goods and services
Physical Premises Security Information	Personal data relating to the records and documents obtained when entering to physical premises and during the stay in such premises
Process Security Information	Personal data processed for the purposes of ensuring administrative, legal and commercial security of both our employees and our Company during the conduct of commercial activities of our Company

¹ Personal data means a data which explicitly belong to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.

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Risk Management Information	Personal data processed by means in accordance with legal principles, customs of trade and principles of good faith for us to manage our commercial, technical and administrative risks
Financial Information	Personal data processed with respect to indicating all financial information, document and records generated based on the nature of the legal relationship established between our Company and the data subject
Employee Candidate Information	Personal data processed relating to the candidates who have applied to our Company in order to become an employee or are deemed as employee candidate due to the requirements of the human resources of our Company as per the customs of trade and principles of good faith
Information on Social Rights and Benefits	Your personal data processed for the purposes of planning the social rights and benefits we provide or to be provided to Employees or other real persons having a working relationship with our Company, determining objective criteria with respect to acquiring such rights and following this progress
Legal Procedure and Compliance Information	Your personal data processed for the purposes of determining and following our legal receivables and rights and performance of our obligations and within the scope of compliance with the legal obligations of our Company and Company policies
Supervision and Inspection Information	Your personal data processed within the scope of compliance with the legal obligations of our Company and Company policies
Special Categories of Personal Data	Data stated under Article 6 of Law no. 6698
Marketing Information	Personal data processed for the purposes of personalization and promoting the usage habit, preferences and requirements, reports and evaluations produced as a result of such processing
Request/ Complaint Management Information	Personal data relating to the reception and evaluation of all requests or complaints addressed to our Company
Incident Management Information	Information and evaluations about incidents that are likely to affect our company's employees and shareholders
Audio / Visual Data	Photographs and camera recordings (except records under Physical Location Security Information), voice recordings, and copies of documents containing personal data

4.2. PURPOSES OF PERSONAL DATA PROCESSING

Our Company processes personal data limited to the purposes and terms set forth within the personal data processing conditions provided under Article 5/2 and 6/3 of the Law no 6698. These purposes and terms are as follows;

- Processing of your personal data for the performance of relevant activity by our Company is specifically envisaged under the laws,
- Processing is directly related and necessary for execution or a performance of a contract,

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- Processing is required for our Company to comply with its legal obligation,
- Provided that personal data has been made public by your side, processing of your personal data by our Company is limited to the purpose of making such data available to the public,
- Processing is necessary for the establishment, exercise or protection of a right,
- Processing is necessary for the purpose of the legitimate interests pursued by our Company provided that such interest does not harm your fundamental rights and freedoms,
- Processing is necessary to protect the vital interests or bodily integrity of the data subject or a third person if the data subject is not in a condition to express his/her consent due to actual impossibility,
- Processing of special categories of personal data other than data relating to health and sex life of the employee where it is specifically envisaged under the laws,
- Processing of special categories of personal data relating to the health and sex life of the data subject only by persons under the obligation of confidentiality or authorized institutions and organizations only for the purposes of protection of public health, preventive medicine, medical diagnosis, conducting of nursing services, planning of the health services and financing.

In the event that above stated conditions are not present the Company obtains explicit consent of data subject in order to carry out data processing activities.

Our Company processes personal data within the scope of; Management of necessary procedures to ensure that our business functions are conducting necessary works in order for the Company to execute its commercial activities; Maintenance of legal and commercial safety of the Company and the Company's business partners; Determination and execution of the activities which are necessary for offering products and services of the Company upon customization based on your liking, user habits and requirements; Determination and execution of the Company's commercial and business strategies; Management of necessary procedures to ensure that our business functions are conducting necessary works in a manner enabling you to benefit from products and services offered by the Company; Determination and execution of the Company's human resources policies and procedures including but not limited to the followings purposes:

- After Sales Support Services
- Agreement Procedures and/or Legal Procedures Monitoring
- Business Activities Planning and Execution
- Business Partners and /or Suppliers Relation Management
- Business Partners and/or Suppliers Information Access Authorization Planning and Execution
- Company Auditing Activity Planning and Execution
- Company Financial Risk Process Management and/or Execution
- Company Fixtures and/or Resources Security Ensuring
- Company Production and/or Operational Risk Management Procedures Planning and Execution
- Conducting the Company Activities in Compliance with Company Procedures and/or Applicable Legislation Company Auditing Activities Planning and Execution
- Corporate Communication Activities Planning and Execution
- Corporate Management Activities Planning and Execution

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- Corporate Risk Management Activities Planning and Execution
- Corporate Sustainability Activities Planning and Execution
- Creation and Management of Information Technology infrastructure
- Creation and Follow-up of Special Insurance Policies for Vehicles Purchased by the Customer
- Customer Relations Management Process Planning and Execution
- Customer Request and/or Complaint Tracking
- Customer Satisfaction Process Planning and/or Monitoring
- Emergency State Management Process Planning and Execution
- Employee Procurement
- Employee Satisfaction and/or Loyalty Process Planning and Execution
- Employees Business Activities Monitoring and/or Auditing and Execution
- Employees Information Access Authorization Planning and Execution
- Employees Social Rights and Benefits Planning and Execution
- Ensuring Data are Accurate and Up-to-date
- Ensuring Security of Company Premises
- Event Management
- Finance and/or Accounting Activity Monitoring
- Human Resources Process Planning and Execution
- Human Resources Required for Production Necessity Planning and Execution
- Information Security Process Planning, Auditing and Execution
- Intercorporate Promotion and Release Process Planning and Execution
- Legal Activity Monitoring
- Market Research Activities Planning and Execution for Product and/or Services Sales and Promotion
- Non-company Training Activities Planning and Execution Performance of Obligations Arising from the Labor Agreement and/or Legislation
- Performance of Corporations Law Procedures
- Product and/or Services Marketing Process Planning and Execution
- Product and/or Services Promotion and/or Marketing Process Planning and Execution
- Product and/or Services Sales Process Planning and Execution
- Production and/or Operation Process Planning and Execution
- Providing Information to Authorized Persons and/or Authorities Due to Legal Requirements
- Skill – Career Development Activities Planning and Execution
- Strategic Planning Activities Execution
- Supply Chain Management Process Planning and Execution
- Visitor Records Keeping and Monitoring

A significant part of the activities carried out by our Company are activities and processes which do not require the explicit consent of the data subject as stated under Article 5.2 and Article 6.3 of the Law no. 6698. Explicit consent of the data subject is obtained for our activities and process that do not fall under the scope of the relevant provisions of the Law no. 6698. It should be noted that personal data received by our Company within this scope, may also be used for activities that permit the

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processing without obtaining the explicit consent as per the Law in addition to activities that require the explicit consent.

An employee not providing his explicit consent does not mean that the entire data processing activity that do not fall under the scope of the above-mentioned purposes shall not be carried out, rather shall mean that data processing activities that are aimed for the same purpose of data processing that is stated under Article 7.1 which does not require the explicit consent of the employee shall not be carried out.

4.3. RETENTION PERIOD OF PERSONAL DATA

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

In case a period for which the data shall be retained is not provided under the legislation, personal data shall be retained for a period as per the implementations of the Company with respect to the services provided while processing such data and the ordinary course of business and such data are then deleted, destroyed or anonymized.

In case the processing purpose has fulfilled and the duration for retention specified by the relevant legislation and the Company has expired, personal data may only be kept for the purposes of citing as evidence in possible legal conflicts or asserting the relevant rights with respect to personal data or forming a defense. Retention period are determined based on limitation period relating to the asserting of the said right or examples in complaints brought against the Company for the same scope that have already been brought even though the limitation period has expired. In such case retained personal data are accessed to for other purposes and only when the access is necessary for a legal dispute. Personal data are deleted, destroyed or anonymized following the expiration of the said period.

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5. CATEGORIZATION RELATING TO THE DATA SUBJECTS OF WHOM PERSONAL DATA ARE PROCESSED BY OUR COMPANY

Although data subject personal data relating to the categories of personal data that are listed below are processed by our Company, the scope of this Policy is limited to our customers, potential customers, employee candidates, company shareholders, company officials, our visitors, employees, shareholders and officials of institutions we are in cooperation with and third parties.

Processing of our employees' personal data shall be assessed according to Policy on the Protection and Processing of Personal Data of Ford Otomotiv Sanayi A.Ş. Employees.

Although personal data of the categories of persons of whom are processed by our Company are within the scope stated above, persons who are outside of such categories may also forward their requests to our Company within the scope of the Law no. 6698. Such requests of these persons shall be evaluated within the scope of this Policy.

Explanations are provided below regarding the concept of data subject such as customers, potential customers, visitors, candidate employee, shareholder and member of the board of directors, real persons within entities/organizations we are in cooperation with and third persons related with such persons within the scope of this Policy.

Data Subject Category	Explanation
Customer	Real persons who are using or have used the goods and services provided by our Company regardless of whether s/he has a contractual relationship with our Company
Potential Customer	Real persons who have requested to use or have shown interest on using our goods and services or it is believed that s/he has shown interest as per the customs of trade and principles of good faith
Visitor	Real persons who visit our web site or who has accessed to the physical premises which our Company is the owner of or conducted an organization
Third Person	Third party real persons who are related with parties ensuring commercial process security or protecting the rights of the above mentioned persons and to ensure benefits or other real persons who do not fall under the scope of this Policy or Policy on the Protection and Processing of Personal Data of Ford Otomotiv Sanayi A.Ş. Employees (For example Guarantor, Companion, Family Members and Relatives)
Employee Candidate	Real persons who have applied for a job in our Company by any means or who have provided his/her CV and relevant information for the review of our Company
Company Shareholder	Real person shareholders of our Company or real person representatives of legal entity shareholders
Company Official	Board Member of our Company or other third persons authorized by our Company

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Employees, Shareholders and Officials of Institutions We are in Cooperation with	Real persons who are the employee, shareholder or official of the institutions that our Company has any kind of business relations with (including but not limited to business partner, supplier yet not limited therewith)
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In the table below, above mentioned categories of data subject and which type of personal data is processed of persons within such categories are detailed:

PERSONAL DATA CATEGORIZATION	CATEGORY DATA SUBJECT OF DATA SUBJECT WHICH THE RELEVANT PERSONAL DATA IS RELATED TO
Identity Information	Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person
Contact Information	Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person
Location Data	Customers, Employees of Institutions we are in Cooperation with
Customer Information	Customer
Information About Family Members and Relatives	Customer, Employee Candidate, Visitor, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person
Customer Process Information	Customer
Physical Premises Security Information	Company Official, Visitor, Employees, Shareholders and Officials of Institutions we are in Cooperation with
Process Security Information	Customer, Company Officials, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person
Risk Management Information	Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person
Financial Information	Customer, Company Shareholder, Company Official, Employees, Shareholders and Officials of Institutions we are in Cooperation with
Personnel Information	Employees, Shareholders and Officials of Institutions we are in Cooperation with
Candidate Employee Information	Employee candidates, Employees of Institutions we are in Cooperation with

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Information Social Rights and Benefits	Employees of Institutions we are in Cooperation with
Legal Process and Compliance Information	Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person
Inspection and Audit Information	Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person
Special Categories of Personal Data	Customer, Employee Candidate, Company Shareholder, Company Official, Employees, Shareholders and Officials of Institutions we are in Cooperation with
Marketing Information	Customer, Potential Customer
Request/ Complaint Management Information	Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person

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6. THIRD PARTIES TO WHOM PERSONAL DATA ARE TRANSFERRED BY OUR COMPANY AND PURPOSES OF TRANSFER

In accordance with Article 10 of Law no. 6698 our Company notifies the data subjects group of persons to whom personal data have been transferred.

According to Articles 8 and 9 of Law no. 6698 (See Section 3/ Title 3.5) our Company may transfer personal data of its customers to the below listed categories of persons:

- (i) Ford Otosan business partners,
- (ii) Ford Otosan suppliers,
- (iii) Ford Otosan subsidiaries,
- (iv) Ford Otosan shareholders
- (v) Legally authorized public entities and institutions
- (vi) Legal entities of private law

The scope of persons stated above to whom data is transferred and the purpose of data transfer is stated below.

Persons to Whom Data May be Transferred	Definition	Purpose of Data Transfer
Business Partners	Parties which the Company has entered into a business partnership with for the purposes of selling, promoting and marketing the goods and services of the Company, after sales support, conducting of mutual customer loyalty programs during the course of Company's business activities.	Limited with ensuring the purpose of establishing the business partnership
Supplier	Parties providing services, during the course of Company's business activities, to the Company under the order and instruction of the Company on a contractual basis.	Limited with the purposes of providing services that the Company outsources from the suppliers and that are necessary for the performance of Company's business activities
Subsidiaries	Companies of which our Company is a shareholder	Limited with ensuring the performance of commercial activities that requires the participation of subsidiaries that may be established in the future.
Shareholders	Main shareholders authorized to determine the strategies relating to the commercial activities of the Company in accordance with the	Limited with the purpose of planning the strategies regarding the commercial activities of the Company in

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	relevant legislation and controlling activities	accordance with the relevant legislation and control
Legally Authorized Public Organizations and Institutions	According to provisions of relevant legislation, public organizations and institutions authorized to receive information and documents from the Company	Limited with the purpose of the request made by the relevant public organization and institution within authorization
Legal Entities of Private Law	According to provisions of relevant legislation legal entities of private law authorized to receive information and documents from the Company	Limited with the purpose of the request made by the relevant legal entities of private law within authorization

Sections 2 and 3 of this Policy are complied with in transfers realized by our Company.

7. PROCESSING OF PERSONAL DATA BASED ON AND LIMITED TO THE PROCESSING CONDITIONS

Our Company data subject informs the data subject regarding the processed personal data in accordance with Article 10 of the Law no. 6698.

7.1. PROCESSING OF PERSONAL DATA AND SPECIAL CATEGORIES OF PERSONAL DATA

7.1.1. Processing of Personal Data

Personal data subject's explicit consent is one of the legal grounds for a lawful personal data processing. Other than explicit consent, personal data may also be processed under the following conditions. Either one of the below mentioned conditions may be the legal grounds for processing personal data or more than one of such conditions may also be the legal grounds for the same personal data processing. In case the processed personal data are qualified under the special categories of personal data, conditions provided under the Section 7.1.2 are applied.

Although legal grounds for the processing of personal data by our Company may differentiate, general principles relating to the processing of personal data stated under Article 4 of Law no. 6698 (See Section 3.1.) are complied with.

(i) Express Consent of the Owner of Personal Data Subject

One of the conditions for processing personal data is the explicit consent of the data subject. Explicit consent of the data subject shall be specific and freely given upon informing.

In the event that any of the conditions relating to the collection of personal data under (ii), (iii), (iv) (v), (vi), (vii) and (viii) data subjects are present, processing of such personal data are based on the explicit consent of the data subject.

For personal data to be processed based on the explicit consent provided by the data subject, the Company obtains explicit consent of the data subject by specified legal means.

(ii) Specifically Envisaged Under Laws

Personal data of the data subject may be lawfully processed in in case it is specifically envisaged under the laws.

(iii) Not Being Able to Obtain the Data Subject's Explicit Consent due to Actual Impossibility

In case processing is necessary to protect the vital interests or bodily integrity of the employee or a third person if the employee is not in a condition to express his/her consent due to actual impossibility, personal data of the employee may be processed without obtaining his explicit consent.

Example: Giving information on blood type of a customer who has fainted, to doctors by the customer's friends.

(iv) Directly Related with the Execution or Performance of a Contract

Data of the parties to a contract may be processed if it is necessary, provided that it is directly related to the execution or performance of a contract.

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Example: Obtaining the name and contact information of the person buying a car

(v) Fulfilment of a Legal Obligation by the Company

Data subject's personal data may be processed in case processing is necessary for the fulfillment of a legal obligation of the Company as the data controller.

Example: Presenting the information requested by a Court order.

(vi) Personal Data Made Publicly Available by the Employee

In the event that the data subject has made his/her personal data available to the public such data may be processed.

Example: Data of a person who has stated that s/he wishes to purchase a car with certain properties on a website and has provided his/her phone number may be processed without obtaining his/her explicit consent provided that the processing is limited to this scope. Within this framework, persons who wish to sell the said car may contact the relevant person without requiring any consent.

(vii) Necessary for the Establishment, Exercise or Protection of a Right

In case processing is necessary for the establishment, exercise or protection of a right, employee's data may be processed.

Example: Retention of data having the value of evidence (sales contract, invoice) and usage of it when it is necessary.

(viii) Processing Personal Data Based on Legitimate Interest

In case processing is necessary for the legitimate interest of the Company, personal data may be processed provided that fundamental rights and freedoms of the data subject are not violated.

Example: Personal data processed for internal calculations to be made by accounting.

7.1.2. Processing of Special Categories of Personal Data

In case the data subject does not provide his explicit consent, special categories of personal data may be processed by our Company in the below mentioned conditions provided that sufficient measures specified by the Board are taken.

- (i) Special categories of personal data other than data relating to health and sex life of the employee are processed where it is specifically envisaged under the laws,
- (ii) Special categories of personal data relating to the health and sex life of the data subject may only be processed by persons under the obligation of confidentiality or authorized institutions and organizations only for the purposes of protection of public health, preventive medicine, medical diagnosis, conducting of nursing services, planning of the health services and financing.

8. PERSONAL DATA PROCESSING ACTIVITIES UNDERTAKEN IN BUILDINGS, FACILITY ENTRANCES AND INSIDE THE PREMISES AND WEBSITE VISITORS

Personal data processing activities undertaken by our Company in building entrances and inside the facilities are performed in accordance with the Constitution, Law no. 6698 and other relevant legislation.

In order to ensure security by our Company, our Company performs surveillance in the buildings and facilities via security cameras and carries out data protection activities for monitoring visitor entrance and exits.

By way of using security cameras and recording visitor entrance and exits our Company carries out personal data processing activities.

8.1. CAMERA TRACKING ACTIVITIES UNDERTAKEN AT FORD OTOSAN BUILDINGS, FACILITY ENTRANCES AND INSIDE THE PREMISES

In this section, explanations concerning surveillance and monitoring system are provided and information shall be given on how privacy and individual's fundamental rights are protected.

Purpose of surveillance by security cameras is to improve the quality and credibility of services, ensure the safety of life and property of the Company, data subject and other persons and to protect the legitimate interest of such persons.

8.1.1. Legal Grounds for Camera Monitoring Activity

Camera monitoring activity is undertaken by our Company in accordance with Law on Private Security Services and relevant legislation.

8.1.2. Security Camera Monitoring Activity as per Law no. 6698

When undertaking surveillance camera monitoring activities by our Company for security purposes, regulations of the Law no. 6698 are complied with.

In order to ensure security in buildings and facilities our Company undertakes security camera monitoring activities in accordance with personal data processing conditions provided under Law no. 6698 and for purposes foreseen under the laws.

8.1.3. Announcement of Camera Monitoring Activity

Data subject is informed by the Company in accordance with Article 10 of the Law no. 6698.

In addition to the information provided on the general matters, (See Section 3/ Title 3.3) our Company, provides information regarding the camera monitoring activity by more than one method.

Thus, violation of the fundamental rights and freedoms of data subject is prevented and transparency and data subject informing the data subject is ensured.

In relation to the camera monitoring activity carried out by our Company; this Policy is published on our Company's web site (*online Policy regulation*) and notices are hung at entrances of areas where monitoring is made (*local informing*).

8.1.4. Purpose of Camera Monitoring Activity and Limited with the Purpose

Our Company, processes personal data relevant, limited and proportional to the purposes for which they are processed in line with Article 4 of the Law no. 6698.

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The purpose of pursuing camera monitoring activity by our Company is limited to the purposes stated under this Policy. In this regard, security cameras' monitoring angle, number and when the monitoring shall be made are implemented necessary for and limited to achieving the security purpose. Monitoring exceeding the security purposes and that may interfere with the privacy of persons (such as bathrooms) are not subject to surveillance.

8.1.5. Ensuring the Security of Data Obtained

Our Company takes technical and administrative measures for ensuring the security of personal data obtained from camera monitoring activity in accordance with Article 12 of the Law no. 6698 (See Section 2 / Title 2.1)

8.1.6. Retention Period of Personal Data Obtained from Camera Monitoring Activity

Detailed information regarding our Company's retention period of personal data obtained from camera monitoring activity are provided under Article 4.3. with the title Retention Period of Personal Data of this Policy.

8.1.7. Who May Access to Information Obtained as a Result of Monitoring and To Whom Such Information is Transferred

Only limited number of Ford Otosan employees has access to records digitally recorded and retained. Live footage may be monitored by security officers that are outsourced. Limited number of people having access to records is under the obligation of confidentiality of data as per the non-disclosure undertaking.

8.2. MONITORING OF VISITOR ENTRANCES AND EXITS UNDERTAKEN IN FORD OTOSAN BUILDINGS, AND FACILITY ENTRANCES AND INSIDE THE PREMISES

For ensuring the security and for other purposes specified under this Policy, our Company carries out personal data processing activities relating to the monitoring of visitor entrances and exits in the Ford Otosan buildings and facilities.

When personal data of persons visiting Ford Otosan Buildings are collected data subjects are informed by texts hung at the Company or by other means that are made available to our visitors. Data obtained for the purpose of monitoring the visitor entrance and exits are processed only for this purpose and relevant personal data are physically or electronically stored on the data record system.

8.3. KEEPING THE RECORDS OF INTERNET ACCESS PROVIDED TO OUR VISITORS AT THE BUILDINGS AND FACILITIES OF FORD OTOSAN

For purposes of ensuring security by our Company and purposes stated under this Policy; internet access may be provided to our visitors upon their request as long as their stay in our buildings and facilities. In such case, log records on your internet accesses are recorded pursuant to the mandatory rules of Law no. 5651 and secondary regulation legislated according to such Law. Such records are processed only for the purposes of requests made by the authorized public institutions and organizations or fulfilling our legal obligations in the internal auditing procedures.

Within this framework, a limited number of Ford Otosan employees may access to the log records. Employees having access to such log records only access to such information for meeting the requests of authorized public institutions and organizations or for using such information in internal auditing procedures and share with legally authorized persons. Limited number of persons having access to the records is under the obligation of confidentiality as per the non-disclosure undertaking.

8.4. WEBSITE VISITORS

Our Company records the internet activities obtained by technical means (such as cookies) on the websites belonging to the Company for the purposes of ensuring the visits of the visitors meet the purpose of visiting, to provide customized content and conduct online promoting activities.

Detailed explanations on the protection and processing of personal data relating to the activities carried out by our Company are provided on the relevant website under the “Ford Otomotiv Sanayi A.Ş. Privacy Policy”.

9. CONDITIONS ON ERASURE, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

9.1. FORD OTOSAN'S OBLIGATION TO DELETE, DESTROY AND ANONYMIZE PERSONAL DATA

As regulated by Article 128 of the Turkish Penal Code and Article 7 of the Law no. 6698 despite being processed in accordance with the relevant legislation, in case the processing is no longer necessary for the purpose of which the data was processed, personal data are deleted, destroyed or anonymized upon request of the data subject or based on the decision of our Company.

Our Company reserves the right to not to comply with the requests of the data subject pursuant to Article 5/2 of the Law where it has a right/obligation of retaining the personal data.

9.2. TECHNIQUES FOR THE DELETING, DESTRUCTION AND ANONYMIZING PERSONAL DATA

9.2.1. Techniques for Deletion and Destruction of Personal Data

Deletion and destruction techniques mostly used by our Company are as follows:

(i) Physical Destruction

Personal data may be processed by non-automated means provided that they are a part of the data recording system. In order to delete/destroy such data in a way that they cannot be used again physical destruction technique is applied.

(ii) Secured Deletion from Software

Techniques of erasing the data from the software are used when deleting/destroying personal data that are processed wholly or partly by automatic means and kept in digital environments so that they cannot be retrieved.

(iii) Secured Deleting by an Expert

Under certain circumstances, Ford Otosan may cooperate with an expert for erasing personal data on behalf of itself. In such case, personal data are securely deleted/destroyed in a way that they cannot be retrieved by the expert.

9.2.2. Techniques for Anonymizing Personal Data

Anonymizing personal data means processing of the personal data in such a way to make the linking of the data with another data of an identified or identifiable natural person impossible. Our Company may also anonymize data that are processed in accordance with the law in the event that purposes are no longer necessary for which the data have been processed.

In accordance with Article 28 of the Law no. 6698 anonymized personal data may be processed for research, planning and statistical purposes. Such activities are outside the scope of the Law no. 6698 and therefore do not require the explicit consent of the data subject. Since processed personal data that are anonymized are outside the scope of the Law, rights stated under Section 10 of this Policy shall not be applicable for such rights.

The anonymizing techniques mostly used by our Company are as follows:

(i) Masking

Method of anonymization which ensures the main distinctive information of the personal data is removed from the data set.

Example: Transforming the data set in a way it is impossible to identify the data subject by removing information that ensures data subject to be identified such as name, ID number etc

(ii) Aggregation

By way of aggregation personal data are transformed in a way that relating them with any person has become impossible.

Example: Without showing the age of each and every customer, indicating that there are Z number of customers at the age of X

(iii) Data Derivation

By way of data derivation a more generic content from the content of the personal data is generated and in doing so it is ensured that personal data cannot be related to any person.

Example: Indicating ages instead of birth dates; indicating the area of residence instead of the full address.

(iv) Data Shuffling

By way of data shuffling values within the personal data set are shuffled and relation between de values and persons are cut off.

Example: By changing the quality of the audio in a way that it cannot be related to the data subject.

10. RIGHTS OF DATA SUBJECTS; METHODOLOGY FOR THE USE AND EVALUATION OF THESE RIGHTS

Our Company informs data subjects regarding their rights as per Article 10 of the Law no. 6698 guides data subjects on how these rights shall be used. Our Company carries out required channels, internal operation and administrative and technical arrangements in accordance with Article 13 of the Law no. 6698 for the evaluation of data subjects' rights and to provide necessary information data subjects.

10.1 THE RIGHTS OF DATA SUBJECT AND DATA SUBJECT'S USE OF SUCH RIGHTS

10.1.1. Rights of the Data Subject

Data subjects are entitled to the following rights:

- (1) Learn whether or not data relating to him/her are being processed;
- (2) Request further information if personal data relating to him have been processed;
- (3) Learn the purpose of the processing of personal data and whether or not data are being processed in compliance with such purpose;
- (4) Learn the third-party recipients to whom the data are disclosed within the country or abroad,
- (5) Request rectification of the processed personal data which is incomplete or inaccurate and request such process to be notified to third persons to whom personal data is transferred.
- (6) Request deletion or destruction of data in the event that the data is no longer necessary in relation to the purpose for which the personal data was collected, despite being processed in line with the Law no. 6698 and other applicable laws and request such process to be notified to third persons to whom personal data is transferred.
- (7) Object to negative consequences about him/her that are concluded as a result of analysis of the processed personal data by solely automatic means,
- (8) Demand compensation for the damages he/she has suffered as a result of an unlawful processing operation.

10.1.2. Circumstances Where Rights of the Data Subject May Not Be Asserted

As per Article 28 of the Law no. 6698 data subjects may not assert their rights stated under Article 10.1.1 since the below mentioned circumstances are not included into the scope of the Law:

- (1) Processing personal data with official statistics by way of anonymization for research, planning and statistical reasons,
- (2) Processing personal data within the scope of national defense, national security, public security, economic security, right to privacy or for artistic, historical, literary, scientific purposes or within the scope of freedom of expression on condition that personal rights are not violated or any crimes have not been committed,
- (3) Processing of personal data by public bodies and organizations assigned and authorized by law, regarding preventive, protective and informative activities directed at securing national defense, national security, public security, public order or economic security,
- (4) Processing personal data regarding transactions related to investigation, prosecution, judicial and enforcement by judiciary and enforcement authorities.

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As per Article 28/2 of the Law no. 6698 data subjects may not, other than the right of demanding compensation for damages, assert their rights stated under Section 10.1.1 under the below mentioned circumstances:

- (1) Processing personal data is required for crime prevention or crime investigation,
- (2) Processing personal data which are made public by data subject,
- (3) Processing personal data is required for leading disciplinary investigation and prosecution and auditing and regulating duties by public institutions and organizations and professional organizations having the quality of public institutions based on their authorities stated by laws,
- (4) Processing of personal data is necessary for the protection of state's economic and financial interests with regard to budgetary, taxation and financial matters.

10.1.3. The Use of Personal Data subject of His/Her Rights

Data subjects may forward their requests concerning their rights stated under Title 10.1.1. to our Company free of charge through the below stated methods:

- (1) Bring it in person to the following address upon filling the form provided on the website **www.fordotosan.com.tr** and signing it. (Akpınar Mahallesi Hasan Basri Caddesi No:2 Sancaktepe, İstanbul)
- (2) Sent through a notary to the following address upon filling the form provided on the website **www.fordotosan.com.tr** and signing it. (Akpınar Mahallesi Hasan Basri Caddesi No:2 Sancaktepe, İstanbul)
- (3) Via e-mail addressed to **fordotosan@fordotosan.hs02.kep.tr** upon filling the application form provided on the website **www.fordotosan.com.tr** and signing the form with your electronic signature registered pursuant to the Law on Electronic Signature numbered 5070.

Third parties may not make requests on behalf of data subjects.

For a person other than the data subject the original of the power of attorney prepared for the person applying on behalf of the data subject by the data subject must be presented.

In order to exercise their rights, data subjects shall fill the above mentioned "Application Form for Applications to be made to Data Controller by the Data Subject as per Law no. 6698" The method of application to be made with this form is also explained in detail in this form.

In the event the procedure requested by the data subject requires an additional cost, our Company shall charge a fee from the tariff specified by the Board. The placement method of such fee shall be stated in the Application Form. In case such fee is not placed in accordance with the explained method, applications shall not be taken into consideration.

10.1.4. Data Subject's Right of Complaint to the Board

In case the application of the data subject is refused pursuant to Article 14 of the Law no. 6698, or the response is not sufficient or the response is not provided in due time; the data subject is entitled to make a complaint to the Board within 30 days upon receipt of the Company's response or in any event, within 60 days following the application date.

10.2. RESPONSE OF FORD OTOSAN TO THE APPLICATIONS

10.2.1. Company's Procedure and Term for Responding to Applications

In the event data subject forwards his request to our Company as per procedure given under Title 10.1.3. of this Section, our Company shall conclude the relevant request according to the nature of the request as soon as possible and within thirty days at the latest.

10.2.2. Information the Company May Request from the Applicant

The Company may request for information from relevant person to determine whether the applicant is the subject of personal data.

In order to clarify the matters in the data subject's application the Company may address questions to the data subject concerning his application.

10.2.3. Company's Right to Refuse the Application of the Data Subject

Under below mentioned circumstances, our Company may refuse the application of data subject by declaring the reasons for such refusal:

- (1) Processing of personal data by anonymizing through official statistics with such purposes of research, planning and statistics.
- (2) Processing personal data with the purposes of art, history, literature or science or within the scope of freedom of expression only if it does not constitute a crime and violation of national defense, national security, public security, public order, economic security and right of privacy.
- (3) Processing of personal data within the scope of the activities exercised by public entities and organizations authorized legally in order to ensure national protection, national security, public security, public order or economic security.
- (4) Processing of personal data by judicial authorities or executive authorities regarding investigation, prosecution, judgment or execution procedures.
- (5) In case processing of personal data is required for the prevention of committing to crime or a crime investigation.
- (6) Processing of personal data which has been made publicly available by the data subject.
- (7) In case processing of personal data is required for disciplinary proceedings and prosecution or to fulfil the obligations of regulation or supervision of state institutions and organizations and organizations with public institution status.
- (8) In case processing of personal data is required for the protection of state's monetary interests relating to budget, taxes and financial matters.
- (9) Possibility of data subject's request violating the rights and freedoms of others.
- (10) Requests that require disproportionate effort.
- (11) In case the requested information is publicly known.

11. THE RELATION OF COMPANY POLICY ON THE PROTECTION AND PROCESSING OF PERSONAL DATA WITH OTHER COMPANY POLICIES

Basic policies, procedures and instructions prepared or to be prepared by the Company on the protection of personal data and processing relating to the principles set forth under this policy are associated with this Policy. Harmonization between the procedures operated by the Company based on different policies but on similar purposes is ensured by connecting this policy, procedure and instructions with other basic policies of the Company.

12. GOVERNANCE STRUCTURE OF THE COMPANY POLICY ON PROTECTION AND PROCESSING OF PERSONAL DATA

A Governance structure is established by the Company to ensure actions in accordance with the regulations of the Law no. 6698 and the enforcement of Policy on the Protection and Processing of Personal Data.

The “Committee for the Protection of Personal Data” has been established under the Presidency of Information Technologies Directorate for managing this policy and other policies, procedures and instructions related to and associated with this Policy within the Company (See Section 11). Within this framework, Information Technologies Director has been appointed as **Data Controller of Ford Otosan Operations**. The duties of the Committee for the Protection of Personal Data are as follows:

- Ensuring the development of main policies, procedures and instructions on Protection and Processing of Personal Data and implementations thereof.
- Implementation of the policy on protection and processing of personal data and deciding on how to supervise it and within this context making assignments within the Company and facilitating coordination.
- Determining the necessary matters in order to comply with the Law and relevant legislation; making assignments to relevant departments and supervising its practice and facilitating the coordination.
- Raising awareness on protection and processing of personal data both within the Company and institutions which the Company is in cooperation with.
- Identifying risks arising from activities of processing personal data and taking necessary measures; submitting improvement suggestions to the approval of senior management.
- Organizing trainings on personal data protection, in order to ensure implementation of policy, procedures and instructions.
- Making decisions about applications of data subjects.
- Coordinating the information and education activities in order to inform the data subjects about personal data processing activities and their legal rights.
- Ensuring the preparation and enforcement of alteration of basic policies, procedures and instructions related to the Protection and Processing of Personal Data.
- Monitoring the developments and regulations regarding Personal Data Protection; providing suggestions to senior management in accordance with these developments and regulations with regards to the requirements that must be fulfilled within the Company.
- Coordinating relations of the Company with Board and Authority.
- Fulfilling other duties regarding personal data protection assigned by the Company management.

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ANNEX-1 ABBREVIATIONS

Law no. 6698	:	Law on Protection of Personal Data numbered 6698 and dated March 24, 2016 published in the Official Gazette dated April 7, 2016 and numbered 29677.
EU	:	European Union
Constitution	:	Constitution of the Republic of Turkey dated November 7, 1982 and numbered 2709 published in the Official Gazette dated November 9, 1982 numbered 17863.
Board	:	Personal Data Protection Board
Authority	:	Personal Data Protection Authority
Policy	:	Ford Otomotiv Sanayi A.Ş. Policy on the Protection and Processing of Personal Data
Company/Ford Otosan	:	Ford Otomotiv Sanayi A.Ş.
Turkish Code of Obligations	:	Turkish Code of Obligations dated January 11, 2011 and numbered 6098 published in the Official Gazette dated February 4, 2011 numbered 27836.
Turkish Penal Code	:	Turkish Penal Code dated September 26, 2004 and numbered 5237 as published in the Official Gazette dated October 12, 2004 and numbered 25611.
Turkish Commercial Code	:	Turkish Commercial Code dated January 13, 2011 and numbered 6102 published by the Official Gazette dated February 14, 2011 and numbered 27846

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ANNEX-2 SIGNIFICANT DATES FOR THE IMPLEMENTATION OF THE LAW NO. 6698

April 07, 2016	As of April 07, 2016 the Company acts in compliance with the below mentioned obligations: (i) General rules and principles related to the processing of personal data (ii) Obligations related to informing data subjects (iii) Obligations related to ensuring security of personal data
October 07, 2016	As of October 07, 2016 the below listed regulations shall enter into force and the Company shall act in accordance with these regulations: (iv) Provisions relating to the transfer of personal data to third parties and abroad (v) Regulations concerning the data subject exercising of his right on applying to our Company (to learn whether his personal data are processed, requesting for information, learning about the people such data are transferred to and right to request rectification) and his complaints to the Board.
April 07, 2017	(vi) Consents gained in accordance with the Law prior to April 07, 2016, unless otherwise is stated by the data subject, shall be deemed as in compliance with the Law as of April 7, 2017. (vii) As of April 7, 2017 Regulations related to the Law shall enter into force and the Company shall act in accordance with these regulations.
April 07, 2018	Personal data which has been processed prior to April 7, 2016 shall either be complied with the Law by the Company until 7 April 2018, or shall be deleted or anonymized.

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ANNEX-3 PROCESSING THE PERSONAL DATA OF EMPLOYEE CANDIDATES AND EMPLOYEES OF BUSINESS PARTNERS

DATA SUBJECT	COLLECTING AND PROCESSING OF PERSONAL DATA	USE OF RIGHTS AND APPLICATION
Employee Candidates	<p>Personal data of Employee Candidates collected during recruitment process and special categories of personal data collected based on the quality of the work are processed by our Company with the purposes stated under Section no. 4.2. and Section no. 7. of this Policy and the purposes listed below:</p> <ul style="list-style-type: none"> • Evaluating candidate's qualification experience, suitability for the job position • Verifying the accuracy of information presented by the candidate or conducting reference research by communicating with third parties, if necessary. • Contacting with the candidate regarding the application and the recruitment process or in case the candidate is suitable for the position, contacting with the candidate for any position that has become available within the country or abroad. • Meeting the requirements of any legislation or requests of authorized institutions or organizations, • Developing and improving recruitment principles which the Company applies. <p>Personal data of the candidates may be collected via the below mentioned methods and means:</p> <ul style="list-style-type: none"> • Digital application form published in writing or electronically • CV's that candidates forward to the Company via e-mail, cargo, reference and similar methods, • Recruitment or consultancy companies; • During face to face interview or interviews made via video conference and phone. • Controls made and conducted for the verification of the information that the candidate has presented by the Company. • Results of recruitment tests determining skills and personality traits which are 	<p>Employee Candidates may submit their requests concerning their rights which arise due to the inherence of being data subject to our Company by methods explained under Section 10 of this Policy.</p>

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	conducted and reviewed by experts having experience	
Business Partners' Employees	Within the scope of performing commercial activities of the Company with its business partners, it may process personal data related to the employees of its business partners with the purposes explained under Section 4.2. and Section 7 of this Policy.	Employee Candidates may submit their requests concerning their rights which arise due to the inherence of being data subject to our Company by methods explained in Section 10 of this Policy.