

## **DATA SUBJECT ACCESS REQUEST FORM**

### **I. DATA SUBJECT'S RIGHT OF ACCESS**

Pursuant to Article 20 of the Constitution of the Republic of Turkey, everyone has the right to request the protection of his/her personal data. This right includes being informed of, having access to and requesting the correction and deletion of his/her personal data, and being informed of whether his/her personal data is used in consistency with envisaged objectives.

- **Scope of the Access Right**

Pursuant to Article 11 of the Law on Protection of Personal Data numbered 6698 ("**Data Protection Law**"), data subject has the right to request the following from the Company:

- (1) Learn whether his/her personal data is being processed,
- (2) Request further information on how his/her personal data is being processed,
- (3) Learn the purpose of the processing of his/her personal data and whether his/her personal data is being processed limited with those purposes,
- (4) Learn the third-party recipients to whom his/her personal data is transferred domestically or abroad,
- (5) Request rectification of the personal data which is incomplete or is processed inaccurately; and request the recipients, to be notified from the rectification transaction carried out in this respect,
- (6) Request erasure, destruction, or anonymization of his/her personal data when data are no longer needed for their original processing purpose, and request the recipients to be notified about this request,
- (7) Object to being subject to a negative decision based solely on automated processing,
- (8) Demand compensation for the damages he/she has suffered as a result of unlawful personal data processing.

- **Exemptions of the Access Right**

Pursuant to Article 28 of the Data Protection Law, the following circumstances are excluded from the scope of the Data Protection Law. Accordingly, it would not be possible for data subjects to impose their right of access for the following situations:

- (1) Processing of personal data for artistic, historical or scientific purposes, or within the scope of the freedom of expression, provided that these data processing

activities do not constitute a crime or violate national defense, national security, public security, public order, economic security, right to privacy or personal rights.

- (2) Processing of personal data for official statistics or research, planning and statistical purposes by anonymizing such data,
- (3) Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations duly authorized and assigned by the law, to maintain national defense, national security, public security, public order, or economic security,
- (4) Processing of personal data by public institutions and organizations duly authorized by law, with regard to investigation, prosecution, criminal proceedings or execution proceedings.

Pursuant to Article 28/2 of the Data Protection Law; data subject has no right to access under the following circumstances, other than demanding compensation for damages from the Company:

- (1) If the processing of personal data is necessary for the prevention of criminal offense or for criminal investigation,
- (2) If the processing of personal data is related to the data that is made publicly available by the data subject,
- (3) If the processing of personal data is necessary within the scope of supervision and regulation duties, and investigation and prosecution activities of public institutions, organizations, and professional organizations with public institution status, which are duly authorized by the law,
- (4) Processing of personal data is necessary for protection of State's economic and financial interests with regard to budgetary, tax-related and financial issues.

## **II. COMPANY'S OBLIGATION TO COMPLY WITH THE ACCESS REQUEST**

In accordance with Article 13 of the Data Protection Law, the Company acting in the capacity of data controller, shall respond to written access request of the data subject within the shortest time possible depending on the content of the request and within thirty (30) days at the latest.

The Company may request further information from the applicant to determine whether the applicant is the owner of the data requested. The Company may also ask the applicant to provide certain information regarding the access request, to respond to the data subject's request.



Sabancı Holding may decline the access request on justified grounds under certain circumstances where the request bears the possibility to cause violation of other people's rights and freedoms, the request involves disproportionate effort, the information requested is publicly available, or other grounds that will be explained by the Company.

### III. ACCESS REQUEST PROCESS TO BE FOLLOWED BY THE DATA SUBJECT

Data subject shall apply to the Company, in writing or via other methods specified by the Personal Data Protection Board (the "**Board**") in accordance with Article 13 of the Data Protection Law.

This Form will be used for access requests that will be made in writing to the Company by one of the following methods;

- Registered letter with return receipt,
- Delivering the Form to \_\_\_\_\_ address in person,

#### • Access Request Methods

ACCESS REQUEST METHOD	Through registered letter with return receipt	In person
ACCESS REQUEST ADDRESS	Sabancı Center 4. Levent, 34330 İstanbul/Türkiye	Sabancı Center 4. Levent, 34330 İstanbul/Türkiye

#### • Data Subject's Right of Access

	Matter	Choice
1	Is the Company processing my personal data?	
2	If my personal data is being processed at the Company, I request further information in this respect.	
3	If my personal data is being processed at the Company, I request information regarding the purpose of personal data processing activities and whether these activities are being carried out limited with such purposes.	
4	I request information whether my personal data transferred to third-party recipients domestically or abroad. If so, I request further information in this respect.	

5	<p>I request rectification of my personal data, which is incomplete or is processed inaccurately at the Company.</p> <p><b>If the data subject makes this request, the Company should be provided with the following information:</b></p> <ul style="list-style-type: none"> <li>• <b>The content of your personal data that you require to be rectified (data that is incomplete or inaccurate).</b></li> <li>• <b>Documents that provide accurate and complete information regarding your personal data.</b></li> </ul>	
6	<p>I request;</p> <p><input type="checkbox"/> Erasure or <input type="checkbox"/> Anonymization</p> <p>of my personal data because my data are no longer needed for their original processing purposes.</p> <p><b>If the data subject makes this request, the Company should be provided with explanatory information/documents that show that the data are no longer needed for their original processing purposes.</b></p>	
7	<p>If my personal data are incomplete or have been processed inaccurately at the Company, I request the recipients to be notified from the rectification carried out in this respect.</p> <p><b>If the data subject makes this request, the Company should be provided with the following information:</b></p> <ul style="list-style-type: none"> <li>• <b>The content of your personal data that you require to be rectified.</b></li> <li>• <b>Confirmatory and supplementary documents regarding your personal data</b></li> </ul>	
8	<p>If my personal data are no longer needed for their original processing purposes, I request the recipients of my data to be given this information.</p> <p><b>If the data subject makes this request, the Company should be provided with the explanatory information/document stating that the data are no longer needed for their original processing</b></p>	



	<b>purposes.</b>	
<b>9</b>	<p>I am objecting to being subject to a negative decision based solely on automated processing.</p> <p><b>If the data subject makes this request, the Company should be provided with the explanatory information/document stating the negative decision and consequences.</b></p>	
<b>10</b>	<p>I demand compensation for the damages that I have suffered because of unlawful personal data processing operations.</p> <p><b>If the data subject makes this request, the Company should be provided with the explanatory information/documents showing the damages you have suffered.</b></p>	

#### IV. COMMUNICATING WITH THE APPLICANT

The applicant should provide the following information so that we can reply to your access request and to communicate with you in this respect.

Name-Surname	:	
Turkish ID Number	:	
Address	:	
Mobile Phone Number	:	
E-mail Address	:	
Your relation with the Company	:	<input type="radio"/> Business Partner <input type="radio"/> Visitor <input type="radio"/> Other
Whether your relation with the Company has ended	:	<input type="radio"/> My relation with the Company continues <input type="radio"/> My relation with the Company has ended
Contact information preference	:	

Access Request Date :

Signature :