



DUYGU CONTRACTING AND CONSTRUCTION INC.

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Information Confidentiality Policy

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1. Purpose and Scope

The Information Confidentiality Policy (the “Policy”) aims to protect personal data, trade secrets, technical information and all other confidential information belonging to Duygu Contracting and Construction Inc. and all group companies affiliated with and/or related to the controlling shareholders of this company, as well as current or prospective customers, third parties, business partners, employees and job applicants, shareholders, visitors and employees of collaborating institutions.

The Policy is intended to ensure Duygu Construction’s compliance with applicable legislation, Personal Data Protection Law No. 6698 (“KVKK”) and national and international data protection standards applicable in the countries in which it operates, such as the GDPR and ISO 27001.

This Policy applies to all persons and organisations whose personal or confidential information is obtained by Duygu Construction in the course of its activities.

2. Definitions

Terms, words and expressions used in the Policy that are not otherwise defined under this heading shall have the meanings assigned to them under applicable legislation, relevant regulations and industry practice.

Duygu Construction: Refers collectively to Duygu Contracting and Construction Inc. and all group companies affiliated with and/or related to the controlling shareholders of this company. All such companies are collectively referred to as “Duygu Construction” under this Policy.

Explicit Consent: Consent relating to a specific matter, based on information and expressed freely.

Anonymisation: Rendering personal data incapable of being associated in any manner with an identified or identifiable natural person, even when matched with other data.

Personal Data: Any information relating to an identified or identifiable natural person.

Processing of Personal Data: Any operation performed on personal data, including obtaining, recording, storing, retaining, altering, reorganising, disclosing, transferring, receiving, making available, classifying or restricting its use, whether wholly or partly by automated means or by non-automated means forming part of a data filing system.

Legislation: All applicable regulations concerning the protection of personal data in Türkiye and in the countries and regions in which the Company operates, including in particular Personal Data Protection Law No. 6698.

Phishing: A fraudulent method intended to obtain user information by sending deceptive e-mail messages.

Data Controller: The natural or legal person who determines the purposes and means of processing personal data and is responsible for establishing and managing the data filing system.

Data Processor: The natural or legal person who processes personal data on behalf of the data controller under the authority granted by the data controller.

3. General Principles

When processing personal data, Duygu Construction acts in accordance with all relevant national and international data protection regulations, in particular Personal Data Protection Law No. 6698, and with the principles of lawfulness. Accordingly:

Lawfulness and Fairness

Personal data must be processed within the framework established by law, taking into account the interests and reasonable expectations of the relevant person, and only to the extent required for the relevant activities.

Accuracy and, Where Necessary, Keeping Data Up to Date

Both the data subject and the organisation processing the data may suffer harm if personal data are outdated or processed inaccurately. The sources from which personal data are obtained must therefore be identifiable and their accuracy verified.

Processing for Specified, Explicit and Legitimate Purposes

Personal data may be used only for the purposes for which they were processed. The data subject must be given clear information about the processing activity.

Relevance, Limited Scope and Proportionality to the Processing Purpose

A reasonable balance must exist between the processing of personal data and the purpose to be achieved. A person's information must therefore be limited to the minimum necessary and must be relevant to the activity to be performed.

Transfer Rules

Personal data shall not be transferred to third parties in Türkiye or abroad without the data subject's explicit consent, except where an exception under applicable legislation applies.

Conditions for Processing Special Categories of Personal Data

Special categories of personal data shall not be processed without the data subject's explicit consent. Where such data are processed, the measures prescribed by the Personal Data Protection Board shall be implemented. Special-category data other than health and sex-life data may be processed without explicit consent where permitted by law. Personal data relating to health and sex life may be processed without explicit consent only in exceptional cases provided by law, such as protection of public health or the provision of medical diagnosis, treatment and care services.

Retention Period

Personal data shall be retained for the periods prescribed by applicable legislation or for as long as required by the purpose of processing. Upon expiry of the relevant period, the data shall be deleted, destroyed or anonymised.

Duty to Inform

In its capacity as Data Controller, Duygu Construction informs the data subject at the time personal data are obtained about:

- ◆ the identity of the Data Controller and, where applicable, its representative;

- ◆ the purposes for which the data will be processed and the parties to whom they may be transferred; and
- ◆ the method and legal grounds for collecting the data.

Rights of the Data Subject

Data subjects have the right to apply to the Data Controller to learn whether their data are processed, request correction or deletion, request restriction of transfer and claim compensation for damage suffered as a result of unlawful processing.

Circumstances Requiring the Processing of Personal Data

- ◆ Conducting human resources processes,
- ◆ Maintaining corporate communication activities,
- ◆ Ensuring Company security,
- ◆ Conducting statistical studies,
- ◆ Performing work and transactions arising from contracts,
- ◆ Fulfilling legal obligations,
- ◆ Maintaining communication in business relationships,
- ◆ Conducting occupational health and safety processes,
- ◆ Operating information systems processes.

4. Implementation Principles

Clean Desk, Clean Screen and Password Security

All physical documents within Duygu Construction, or belonging to customers or third parties, that contain sensitive, personal or confidential information must be kept in lockable cabinets or drawers whenever employees are away from their desks.

Employees must not keep information obtained through their duties and responsibilities on their computer desktops; such information must be stored on platforms in shared areas that provide appropriate data protection.

Employees must never share their computer login passwords with another employee or third party. Passwords must be strong and changed at appropriate intervals.

Electronic Mail (E-mail)

Employees must not use the e-mail addresses assigned to them for internal and external business communications for personal matters. They must therefore not use Duygu Construction e-mail addresses on non-business platforms, register with unknown organisations or social media platforms using such addresses, or publish their e-mail addresses on social media.

Employees must not open e-mails or attachments from suspicious senders and must refer them to the relevant Information Technology (IT) Unit so that it can verify whether they are phishing attempts.

Except where sharing personal data is required by the nature of the work and the relevant persons have provided approval, employees must not send information containing personal data in unprotected form by e-mail to third parties outside the Company. In such cases, personal data must be masked.

Access to Shared Areas

Employees may access only the information they need for their duties and responsibilities. Access rights to files in shared areas are controlled and monitored by the Information Technology Unit. The IT team takes the measures necessary to prevent employees from accessing information that is not required for their roles; access rights are assigned in accordance with job descriptions, reviewed periodically and corrected where necessary. Employee authorisation profiles are defined by the Human Resources Unit and implemented by the IT Unit.

Security of Physical and Digital Documents

Only employees authorised for the relevant processes may enter areas where physical documents are stored throughout Duygu Construction. The IT Unit shall take the necessary measures for this purpose.

Documents stored digitally and containing information belonging to employees, customers or third parties must not be removed from Duygu Construction in physical or digital form unless strictly necessary.

Use of Social Media

Employees must not share through their personal social media accounts any non-public personal or commercial information obtained through their work. This prohibition applies even where employees use social media accounts anonymously.

Detailed requirements for employees' use of social media are set out in the Duygu Construction Social Media and Communications Policy.

5. Authority and Responsibilities

Duygu Construction employees and third parties within the scope of this Policy must comply with it. If conduct contrary to the rules set out in the Policy or creating a compliance risk is identified, it must be reported without delay through one of the following channels:

- Ethics and Compliance Committee
- Ethics Line

Persons who report in good faith shall not be subjected to retaliation or adverse treatment.

The Ethics and Compliance Committee is responsible for communicating the requirements of this Policy to employees, ensuring that they are understood and establishing internal control mechanisms for implementation.

Where legal requirements in countries in which Duygu Construction operates are stricter than this Policy, the relevant country legislation shall prevail.

Activities carried out and violations identified under this Policy shall be reported annually to the Board of Directors in accordance with the principles of transparency and accountability.

6. Revision History

This Policy has entered into force following approval by the Ethics and Compliance Committee pursuant to the relevant resolution of the Company's Board of Directors. The Ethics and

Compliance Committee is responsible for reviewing the Policy at least annually in parallel with changes in legislation and international standards and updating it where necessary.