

LC WAIKIKI PERSONAL DATA PROTECTION AND PROCESSING POLICY

INTRODUCTION

LC Waikiki is a global retail company in ready-made clothing sector centered in Turkey. LC Waikiki pays the utmost importance to compliance to the legal regulations with its operation affiliates both domestically and internationally. In this respect, within the framework of the compliance to the regulations regarding the protection of personal data, LC Waikiki takes the necessary administrative and technical precautions, establishes a system and carries out the necessary work to transform this subject into an institutional culture besides fulfilling a legal obligation.

PURPOSE OF THE POLICY

The main purpose of the LC Waikiki Personal Data Protection and Processing Policy (“The Policy”) is to describe the activities and systems internalized with respect to personal data processing and personal data protection that is legally executed by LC Waikiki and to ensure transparency by informing our employees, employee candidates, former employees, company shareholders, company authorities, visitors, employees of our partner companies, their shareholders and authorities, customers, potential customers and primarily third parties and natural persons whose personal data is processed by our Company in this respect.

The Policy regulates the basic principles and data security principles sets forth the implementations required by the legal regulation for domestically and internationally operating affiliates of the Company. This Policy is aimed at ensuring the compliance to the regulation as well as establishing and sustaining the order.

SCOPE

This Policy is handled and prepared based on the General Data Protection Regulation (GDPR) and Personal Data Protection Law no. 6698 and other related regulations. The partners of LC Waikiki, who operate abroad, are responsible to act in line with the regulations of the country they are found primarily. In case there is no legal regulation in the country where LC Waikiki shareholders operate, this Policy regulations hereby shall be in force.

This Policy is applied in all operations that are executed in the organizations owned or administrated by LC Waikiki related to the processing and protection of personal data. This Policy defines the basic control measures that all LC Waikiki employees and the employees of all the organizations cooperating with LC Waikiki are required to know and are expected to conform consistently.

1. DEFINITIONS AND ABBREVIATIONS

The terms and concepts which are found within this Policy hereby are listed and clarified as follows.

DEFINITION/ABBREVIATION	DESCRIPTION
EU	European Union
Explicit Consent	Informed and freely given consent regarding a specific subject

Recipient Group	A natural or legal person category, to which the personal data are disclosed by the Data Controller
Anonymization	Rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data,
Headquarters/HQ	LC Waikiki Mağazacılık Hizmetleri Ticaret A.Ş. official headquarters address as stated in its trade register entry.
GDPR	European Union Data Protection regulation no. 2016/679
Related person and/or Data Subject	The natural person whose personal data is processed
Related User	Persons who process personal data in line with the authorization and instruction they receive within data controller organization or from data controller other than the person/department responsible from storage, retention and backup of data technically.
Destruction	Erasure, destruction or anonymization of personal data
Regulation	Particularly European Union Data Protection regulation no. 2016/679 ("GDPR") and Law no. 6698 on Personal Data Protection ("KVKK") as well as the personal data protection laws and sub-regulations that are in force in all countries where foreign partners of LC Waikiki are found and verdicts and guide documents published by legal organizations
Registry Environment	Any environment where personal data processed fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means, are found.
Personal Data	Any information relating to an identified or identifiable natural person
Processing of Personal Data	Any operation performed upon personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable, classification or preventing the use thereof, fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means,
Board	Personal Data Protection Board
Organization	Personal Data Protection Organization
LC Waikiki	Data Controller and/or LC Waikiki Mağazacılık Hizmetleri Ticaret A.Ş.

Periodic Destruction:	Process of erasing, destroying or anonymizing, which will be carried out ex officio at certain repeating intervals, as specified in the personal data retention and destruction policy, in the event that the conditions for processing personal data, as defined in the Law, completely disappear.
Policy	LC Waikiki Mağazacılık Hizmetleri Ticaret A.Ş Personal Data Protection and Processing Policy
Third Party	Natural and/or legal persons, organizations, institutions or suppliers that LC Waikiki buys services from, executes projects with, sustains a business partnership and cooperation while executing its commercial activities.
Data Processor	The natural or legal person who processes personal data on behalf of the controller upon his authorization
Data Registry System	The registry system in which the personal data is registered through being structured according to certain criteria,
Data Controller	The natural or legal person and/or LC Waikiki who determines the purpose and means of processing personal data and is responsible for establishing and managing the data registry system
Domestic	In line with the related regulation, if the personal data processing activities are executed fully or partially within the geographical borders of the Republic of Turkey, in all areas accepted to be included within the borders of the Republic of Turkey according to the related legislation and in the cloud access fields within these areas, the processing shall be regarded as performed domestically (in Turkey).
Abroad	In line with the related regulation, if the personal data processing activities are executed fully or partially out of the geographical borders of the Republic of Turkey, in situations found to be implementation area by GDPR as well as within EU borders or in other foreign countries which have a special natural regulation and in the cloud access fields within these areas, the processing shall be regarded as performed abroad.

2. PERSONAL DATA CATEGORIES

- 1. Identification** (name-surname, mother's-father's name, mother's maiden surname, marital status, identification card serial number, TC identification number etc.)
- 2. Communication** (address, phone number, e-mail address, contact address, recorded electronic mail address (KEP) etc.)
- 3. Location** (Location information regarding the place of current residence)

4. **Personnel** (Payroll information, disciplinary proceeding, statements of employment and cease of employment, declaration of property information, resume information, performance evaluation reports etc.)
5. **Legal Process** (information used in correspondence with judicial authorities, information in court case etc.)
6. **Customer Process** (call center records, invoices, bill and check information, information on ticket-office receipts, order information, request information etc.)
7. **Physical Space Security** (entrance and exit records of employees and visitors, camera records etc.)
8. **Process Security** (IP address information, website sign in/out information, password information etc.)
9. **Risk Management** (information processed for the management of commercial, technical, administrative risks)
10. **Finance** (balance sheet information, financial performance information, credit and risk information, declaration of property information etc.)
11. **Professional Experience** (diploma information, attended courses, occupational training information, certificates, transcript information etc.)
12. **Marketing** (shopping history information, surveys, cookie records, information obtained through campaigns)
13. **Visual and Audio Recordings** (visual and audio recordings etc.)
14. **Philosophical beliefs, Religion, Sect and other beliefs** (information regarding the religion and the sect the person belongs to, religious, philosophical and other beliefs, etc.)
15. **Appearance** (information regarding appearance, clothes etc.)
16. **Health Information** (information regarding disability, blood group, personal health, used medical device and prostheses information etc.)
17. **Penalty Conviction and Security Measures** (information on penalty conviction, information on security measures etc.)
18. **Biometric Data** (palmprint information, fingerprint information, retina scan information, face recognition information etc.)

3. PRINCIPLES REGARDING THE PROCESSING OF PERSONAL DATA

In case personal data is to be processed, LC Waikiki proceeds with the personal data processing and transferring activities lawfully and in good faith, transparently, accurately and if necessary up-to-date, specific, open and for justifiable purposes, in connection with the purpose, in a limited and measured manner based on privacy within the scope of the related Regulation. LC Waikiki enlightens the personal data owners in this respect and offers the necessary information in case the data owners demand information. Personal data is retained for the period of time stipulated by relevant legislation or the purpose for which they are processed.

3.1. Conditions for Processing of Personal Data

In line with the regulations, personal data is processed in case one of the conditions written below is present. One or more conditions indicated below may as well constitute a ground for the same personal data processing activity.

3.1.1. Presence of the Explicit Consent of the Personal Data Owner:

Personal data is processed when the freely given, informed explicit consent of the data owner is present. For personal data to be processed based on the explicit consent of the personal data owner, the explicit consents of the personal data owners are obtained by related methods that are provable. As every declaration of intention, the explicit consent of the data subject is always a reversible declaration of intention in cases where there is no violation of the right and the rules of bone fides.

3.1.2. Explicitly Provided by the Law:

Personal data may be processed without seeking explicit consent of the data subject, in the cases where it is explicitly provided for by laws.

Example: The inclusion of the name of the related person on the bill as indicated by the 230th article of the Tax Procedure Law.

3.1.3. When the Explicit Consent of Data Subject Cannot be Obtained due to Physical Impossibility:

Personal data may be processed in case personal data processing is mandatory for protecting the life or physical integrity of the data subject or another person who is unable to acknowledge consent due to physical impossibility or whose consent is invalid.

Example: An employee of the company providing the identification information of a personnel, who just had an occupational accident while working, to the doctor.

3.1.4. Direct Relation to the Conclusion or Fulfilment of a Contract:

On the condition that it is directly related to the conclusion or fulfilment of a contract, personal data belonging to the parties of the contract may be processed in case necessary.

Example: The natural person, employed at the moment, obtaining the bank account number of the supplier for the purpose of making a payment.

3.1.5. LC Waikiki Performing its Legal Obligations:

In cases where the processing is obligatory for LC Waikiki, as the Data Controller, to perform its legal obligations, the personal data of the data subject may be processed.

Example: Presenting the data requested by decree of court.

3.1.6. Anonymization of Personal Data by Data Subject:

In case the personal data is anonymized by the data subject himself, the related personal data may be processed.

Example: The person publishing his or her own contact information on social networks to be contacted in certain situations.

3.1.7. Establishment or Protection of a Certain Right:

In case data processing is mandatory for the establishment, exercise or protection of a certain right, personal data of the data subject may be processed.

Example: Use of certain data by company for proof in a case opened by its own employee.

3.1.8. Legitimate Interests of LC Waikiki:

On the condition that the basic rights and liberties of the data subject are not violated, LC Waikiki may process data where it is mandatory for its legitimate interests.

Example: LC Waikiki processing employee personal data for their promotions, salary raises or regulation of social rights on the condition that the basic rights and liberties of the employees are not violated.

3.2. Conditions for Processing of Personal Data of Special Nature

LC Waikiki operates sensitively in line with the required arrangements in the Regulation while processing the personal data of “Special Nature”.

Personal data of special nature, excluding those relating to medical information, may be processed without seeking explicit consent of the data subject by LC Waikiki on the condition that the sufficient precautions to be specified by the Regulation are to be taken, in the cases provided for by laws. Personal data relating to the health of data subject, on the other hand, may only be processed by any person or authorized public institutions and organizations that have confidentiality obligation, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as planning and managing their financing on the condition that the sufficient precautions to be specified by the Regulation are to be taken.

3.3. Purposes of Processing of Personal Data

LC Waikiki may process personal data for various purposes limited to the personal data processing purposes and conditions specified in the Regulation but not limited to those specified here.

- Execution of the Emergency Situation Processes
- Execution of the Information Security Processes
- Execution of the Employee Candidate / Intern / Student Selection and Placement Processes
- Execution of the Application Processes of Employee Candidates
- Performing the obligations originating from Service Contract and Legislation for Employees
- Execution of the Fringe Benefits and Interests Processes for Employees
- Execution of Audits / Ethical Activities
- Execution of Training Activities
- Execution of Access Authorizations
- Execution of the Operations in line with the Legislation
- Execution of Finance and Accounting Processes
- Procurement of Safety for Physical Space
- Execution of the Assignment Processes
- Monitoring and Execution of Legal Processes
- Execution of Internal Audit/ Investigation Activities
- Execution of Communication Activities

- Planning of Human Resources Processes
- Execution / Inspection of Work Activities
- Execution of Occupational Health / Safety Activities
- Receiving and Evaluating Suggestions regarding the Improvement of Work Processes
- Execution of the Work Sustainability Activities
- Execution of Logistics Activities
- Execution of Product/Service Purchasing Processes
- Execution of Support Services After Product/ Service Sales
- Execution of Product / Service Sale Processes
- Execution of Product / Service Production and Operation Processes
- Execution of Customer Relations Management Processes
- Execution of Customer Satisfaction Activities
- Management of Organization and Events
- Execution of Marketing Analysis Works
- Execution of Performance Evaluation Processes
- Execution of Advertisement / Campaign / Promotion Processes
- Execution of Retention and Archiving Activities
- Execution of Social Responsibility and Civil Society Activities
- Execution of Contract Processes
- Monitoring of Requests / Complaints
- Execution of Supply Chain Management Processes
- Execution of Payment Policy
- Execution of Marketing Processes for Products/Services
- Foreigner Personnel Work and Residence Permit Processes
- Execution of Talent / Career Development Activities
- Informing Authorized Person, Institution and Organizations
- Execution of Management Activities
- Creating and Monitoring Visitor Records

4. TRANSFER OF PERSONAL DATA

LC Waikiki ensures personal data is transferred locally and/or internationally in line with the related regulation in all its business processes.

As indicated by the related regulation, personal data cannot be transferred without the explicit consent of the data subject. Exceptionally, if the processing of the personal data falls under the scope of one of the cases specified below, the transfer of the personal data may be possible without seeking the explicit consent of the data subject:

- a) It is clearly provided for by the laws.
- b) it is mandatory for the protection of life or physical integrity of the person or of any other person who is bodily incapable of giving his consent or whose consent is not deemed legally valid.
- c) Processing of personal data belonging to the parties of a contract is necessary, provided that it is directly related to the conclusion or fulfilment of that contract.

- d) It is mandatory for the controller to be able to perform his legal obligations.
- e) The data concerned is made available to the public by the data subject himself.
- f) Data processing is mandatory for the establishment, exercise or protection of any right.
- g) It is mandatory for the legitimate interests of the controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

Personal data cannot be transferred abroad without the explicit consent of the data subject. However, personal data may be transferred abroad without the explicit consent of the data subject provided that one of the exceptional conditions indicated above exists and also the appropriate condition among the following shall be provided in the foreign country where the personal data is to be transferred:

- a) Sufficient protection is provided in the foreign country where the data is to be transferred,
- b) the controllers in Turkey and in the related foreign country guarantee a sufficient protection in writing and the Board has authorized such transfer, where sufficient protection is not provided. (The Board determines and announces the countries where sufficient level of protection is provided.)

5. OBLIGATIONS OF LC WAIKIKI REGARDING THE SECURITY OF PERSONAL DATA

LC Waikiki gives great importance to the security of the data of its customers, employees and all parties of cooperation for the safety, privacy, integrity and accessibility of personal data and personal data of special nature and utilizes the latest technological tools to provide this. All information is retained and backed up in domestic and international secure servers. LC Waikiki takes all the necessary precautions to ensure that its employees and all organizations and institutions of cooperation have adequate awareness and necessary sensitivity with respect to information security. The security measures taken are listed below:

- Network security and application security is ensured.
- Closed system network is used in personal data transfers over network.
- Key management system is implemented.
- Security measures are taken regarding the supply, development and maintenance of information technology systems.
- The security of the personal data stored in cloud is ensured.
- Discipline regulations including information security provisions are present for employees.
- Training and awareness work are offered for employees regarding data security in regular intervals.
- Access logs are stored regularly.
- Corporate policies are prepared and implemented with respect to the subjects of access, information security, usage, retention and destruction.
- Data masking precaution is implemented when necessary.
- Privacy agreements are concluded.

- Former authorization of employees who change position or leave work are removed.
- Up-to-date anti-virus systems are used.
- Firewalls are used.
- Signed contracts include data security provisions.
- Extra security measures are taken for the personal data transferred in paper and the related documents are delivered in classified document format.
- Personal data security policies and procedures are specified.
- Personal data security problems are rapidly reported.
- Personal data security is monitored.
- Necessary security measures are taken with respect to entrance and exists in physical environments containing personal data.
- Security of the physical environments containing personal data is ensured against external risks (fire, flood etc.).
- Security of the physical environments containing personal data is ensured.
- Personal data is minimized as much as possible.
- Personal data are backed up and the security of the backed up personal data is ensured.
- User account management and authorization control systems are implemented and monitored.
- In-house regular and/or random audits are executed and procured.
- Log records are stored without user intervention.
- Present risks and threats are identified.
- Protocol and procedures regarding the security of the personal data of special nature are specified and implemented.
- In case personal data of special nature is to be shared via electronic mail, it is always delivered encrypted and via using KEP or corporate mail account.
- Secure encrypting/ cryptographic keys are used and managed by different departments for personal data of special nature.
- Attack detection and prevention systems are used.
- Leakage test is implemented.
- Cyber security measures are taken and continually monitored.
- Personal data of special nature to be transferred in flash memory, CD and DVD environments are encrypted and then transferred.
- Service providers processing data are regularly inspected with respect to data security.
- Service providers processing data are ensured to gain awareness regarding data security.
- Software preventing data loss are used.

6. CONDITIONS REGARDING ERASURE, DESTRUCTION OR ANONYMIZING OF PERSONAL DATA

Personal data shall be erased, destructed or anonymized by the controller, ex officio or upon demand by the data subject, in the event that the conditions for processing personal data, as specified in the Regulation, completely disappear. Despite being processed under the provisions of the Regulation, personal data shall be erased, destructed or anonymized by the controller, ex officio or upon demand by the data subject, in case the reasons that require processing disappear.

When erasing, destructing or anonymizing personal data it is mandatory to conform to:

- the required general principles within the scope of the personal data processing as specified in the Regulation,
- the required technical and administrative precautions to be taken within the scope of the obligations of the data controller regarding data security and other related regulations,
- Decisions of the Board,
- and the policy of personal data retention and destruction.

All the processes conducted with respect to the erasure, destruction and anonymization of personal data are recorded, and the related records are stored at least three years aside from other legal obligations.

Unless stated otherwise by the Board with a decision, data controller chooses an appropriate option to proceed with among erasure, destruction or anonymization methods. In case demanded by the data subject, the appropriate method is chosen indicating the reason of choice.

LC Waikiki acts according to the criteria specified below for the detection of the retention and destruction periods of processed data in line with the provisions of the Regulation:

- In case the processing of the related data is required by Regulation and a period of time is defined for the retention of data, it is followed. When the defined period of time specified in Regulation ends, other criteria is evaluated for the retention of personal data. In case the retention of personal data is not necessary, it is erased, anonymized or destroyed using an appropriate method.
- In case there is not a specified period of time with respect to the retention of a personal data in the Regulation:
 - The personal data of special nature is immediately destroyed using an appropriate method when the processing of data is no longer necessary.
 - In case the processing of personal data is no longer necessary within the scope of the general principles and/or exceptional provisions of the related Regulation and/or in cases where a contradiction arises, or the regulation is changed and/or abolished the data is erased, anonymized or destroyed using an appropriate method as of the date.
 - Within the framework of the related regulation, reasonable periods of time are specified for the processing of personal data. Together with the expiration of these periods of time and/or when the time required for data retention ends, the related personal data is erased, anonymized or destroyed using an appropriate method unless a valid reason exists which can justify the retention of personal data for longer.
 - Personal data is erased, anonymized or destroyed on the specified periodic destruction dates.

- In cases where the processing of personal data is only realized depending on the condition of explicit consent, personal data erased, anonymized or destroyed when the data subject withdraws his/her consent.
- Personal data is erased, anonymized or destroyed when the purpose which requires the processing or retention of personal data disappears.
- Personal data is erased, anonymized or destroyed in case the data subject claims his right on his personal data within the scope of the regulation and thereupon the demands are accepted by the data controller.
- In cases where the data subject makes a complaint to the Board regarding the event where the data controller has rejected, replied with an unfit answer or did not reply within the time frame provided by the regulation to the application of the data subject which included the request(s) of erasure, anonymization or destruction of his personal data, and the request of the data subject is thus deemed appropriate by the Board, personal data is erased, anonymized or destroyed.

7. OBLIGATIONS REGARDING THE PROTECTION OF PERSONAL DATA AND RIGHTS OF DATA SUBJECT AND PROCEDURE TO ANSWER DATA SUBJECT

7.1. The Obligation to Inform Data Subject

In line with the Regulation and other regulations published by the Personal Data Protection Organization, LC Waikiki informs data subjects before obtaining personal data. In this respect, LC Waikiki informs data subjects on the identity of the representative (if available), the purpose of data processing, to whom and with what purpose the data may be transferred, the method and legal reason of collecting personal data and on the rights of the data subject.

7.2. The Rights of Data Subject and Their Exercise

Data subjects have the following rights:

- Learn whether their personal data is processed or not,
- Request information if their personal data is processed,
- Learn the purpose of personal data processing and whether this data is used for intended purposes,
- Know the local and international third parties to whom personal data is transferred,
- Request correction in case the personal data is processed wrongly or inaccurately and demand the notification of the third parties, to whom the personal data is transferred, of the alterations performed in this respect.
- Request personal data to be erased, anonymized or destroyed, despite the data being processed in line with the provisions of the regulation, in cases where the reasons that require data processing no longer exist and also demand the notification of the third parties, to whom the personal data is transferred, of the alterations performed in this respect.

- Object to any result against self that is obtained solely by analyzing the processed data using automated systems,
- Request compensation for the damage arising from the unlawful processing of his personal data.

In order to exercise the above specified rights, Data Subject should hand in person or deliver through a notary public his request including his clarification on the right he wishes to exercise together with his identification information by filling the form found in <http://corporate.lcwaikiki.com/Kisisel-verilerin-islenmesi-aydinlatma-metni> to the address of “15 Temmuz Mahallesi, Gülbahar Caddesi No: 41 Bağcılar/ İSTANBUL” or send a signed copy of the filled form to KVKK_bilgitalap@lcwaikiki.com e-mail address with an electronic sign via the registered electronic mail address. During the application it is obligatory to provide name, surname and (if the application is in written form) signature, TC Identification Number for Turkish Citizens, Nationality information, Passport Number and if available Identification Number for foreigners, location of residence or work place address for notification, if available electronic mail address for notification, telephone and fax number and subject of request. The information and documents regarding the subject shall be attached to the application as indicated above.

Data Subjects are required to apply in person; it is impossible for a third party to make a request in the name of the data subject. In order a third party to make a request, related third party is required to be authorized with a special procuration issued on his name by the data subject himself. The third party is required to include the document of procuration in his application documents.

7.3. LC Waikiki’s Response Procedure, Time and Right to Reject

LC Waikiki shall conclude demands in the request by taking into account the nature of the demand at the latest within thirty days and free of charge. However, if the action is considered to require an extra cost by the Board or it is indicated so in the related legal regulation, LC Waikiki shall charge the owner of the application in the tariff determined by the related regulation.

LC Waikiki shall accept the application or decline it on justified grounds and communicate its response to data subject in writing or in electronic media. LC Waikiki is not responsible for not receiving and/or not responding to the requests which are not submitted in an appropriate and/or legally valid way.

LC Waikiki may request additional information from the related person in order to verify the identity of the applicant to be that of the data subject. As to clarify the issues found in the application of the data subject, LC Waikiki may ask questions to the data subject regarding his/her application.

By communicating its response, LC Waikiki may decline the application of a data subject in the following cases:

- ✓ Personal data is processed for research, planning and statistical purposes after being anonymized with official statistics.

- ✓ Personal data is processed for artistic, historical or scientific purposes or within the scope of freedom of speech on the condition that it does not constitute a crime or violate national defense, national security, public safety, public order, economic security, privacy of personal life or personal rights.
- ✓ Personal data is processed within the scope of preventive, protective and intelligence activities executed by public institutions and organizations that are assigned and authorized by law, with respect to ensuring national defense, national security, public safety, public order and economic security.
- ✓ Personal data is processed by judicial offices and enforcement authorities with respect to investigation, prosecution, judgement and enforcement procedures.
- ✓ Processing of personal data is required for preventing crime or in crime investigation.
- ✓ Processing of personal data that is made available to the public by the data subject himself.
- ✓ Processing of personal data is required by the assigned and authorized public institutions and organizations together with vocational organizations that are qualified as public institutions for the execution of inspection or regulation duties or discipline investigations or prosecutions.
- ✓ Processing of personal data is required in order to protect the economic and financial interests of the State with respect to budget, tax and financial issues.
- ✓ The request of the data subject bears the possibility of violating the rights and freedom of other persons.
- ✓ The requests that are made require an unproportioned effort.
- ✓ The requested information is public.

If the application is declined, the response is found unsatisfactory or the response is not given in due time, the data subject may file a complaint with the Board within thirty days as of the date on which he learns about the response of the LC Waikiki, or within sixty days as of the application date, in any case. A complaint cannot be filed before exhausting the remedy of application to the controller under Article 7.2.

8. LC WAIKIKI PERSONAL DATA PROTECTION AND PROCESSING POLICY MANAGEMENT STRUCTURE

Within the scope of the protected principles and values hereby this Policy; the related Regulation, guide documents, verdicts of government agencies and within this framework, corporate documents published by LC Waikiki such as global policies, procedures and

implementation memorandums as well as all other Personal Data Protection Activities are executed and regarded as a whole and are conformable with one another. With this purpose, activities related to personal data are executed by Information Security Guidance Committee within LC Waikiki.

8.1. Information Security Guidance Committee and Management Representative / Contact Person

LC Waikiki performs its obligations indicated in the Regulation regarding the protection and processing of personal data and personal data of special nature through Information Security Guidance Committee and Management Representative / Contact Person. The duties and responsibilities of Information Security Committee and Management Representative / Contact Person are as follows:

- Determining basic policies regarding the protection and processing of personal data and required actions for conforming to the regulation,
- Submit the determined basic policy and action steps to the approval of senior management; ensure their implementation and coordination,
- Deciding in what way the policies regarding the protection and processing of personal data shall be implemented and in what way the inspections shall be executed, making assignments in this respect after receiving the approval of senior management,
- Identifying possible risks in the personal data processing activities of the company and ensure the necessary precautions are taken; submit improvement suggestions to the approval of senior management,
- Ensuring the protection of personal data as well as informing of the employees regarding Company policies,
- Concluding the applications of data subjects on the highest level,
- Execute the necessary regulations in-house to enable the company to perform its obligations within the scope of Personal Data Protection and Processing Law,
- Follow recent developments in the subject of personal data protection; offer suggestions to senior management regarding the required actions within the scope of these developments,
- Managing the relations with the Organization and the Board.

INFORMATION SECURITY GUIDANCE COMMITTEE	
President	AGM for Risk Management
Member	Digital Transformation and Information Technologies General Manager
Member	AGM for Information Technologies
Member	AGM for Construction Investments and Audit
Member	AGM for Domestic Retail
Member	Infrastructure and Support Director
Member	CEO Assistant
Member	HQ Finance Director
Member	Personal Affairs Director
Management Representative	Information Security Unit Manager

/ Contact Person	
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9. ENFORCEMENT

Issued by LC Waikiki and effectuated by its publication on the website, this Policy hereby is published on the website of LC Waikiki (<http://corporate.lcwaikiki.com/Kisisel-verilerin-islenmesi-aydinlatma-metni>) and made accessible for related persons on the request of the Data Subject.

This Policy hereby shall remain in force until it is removed from the website.