

AVEC TURİZM OTELCİLİK İNŞAAT TİCARET A.Ş.
SENSITIVE PERSONAL DATA SECURITY POLICY

ARTICLE 1- PURPOSE

Sensitive personal data security policy has been prepared in order to determine the procedures and principles regarding the processing, storage and transfer of special quality personal data processed by **AVEC TURİZM OTELCİLİK İNŞAAT TİCARET A.Ş.**

ARTICLE 2- SCOPE AND BASIS

Sensitive personal data processed by the data controller are within the scope of this policy.

This policy text has been prepared by taking into account the principles determined in the decision of the Personal Data Protection Board dated 31/01/2018 and numbered 2018/10 on "Adequate Precautions to be Taken by Data Controllers in the Processing of Special Quality Personal Data".

ARTICLE 3- DEFINITIONS

Employee	:Company personnel
Electronic media	:Environments where personal data can be created, read, changed and written with electronic devices.
Non-electronic media	:All written, printed, visual etc. media other than electronic media
Contact Person	:Natural person whose personal data is processed
Law	:Law on Protection of Personal Data No. 6698
Personal data	:Any information relating to an identified or identifiable natural person
Personal data processing inventory	:The inventory that data controllers created by associating the personal data with the processing purposes depending on their business processes and legal reason, the data category, the transferred recipient group and the data subject group, explaining the maximum storage period required for the purposes for which the personal data is processed, the personal data foreseen to be transferred to foreign countries and the measures taken regarding data security
Processing of personal data:	Obtaining, recording, storing, retaining, changing, rearranging, disclosing, transferring, taking over, making available, personal data by fully or partially automatic or non-automatic means provided that it is a part of any data recording system and all kinds of operations performed on the data, such as preventing its use or classifying it
Board	:Personal Data Protection Board
Sensitive personal data	: Data about race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data of individuals
Policy	:Sensitive Personal Data Security Policy

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Company :AVEC TURİZM OTELCİLİK İNŞAAT TİCARET A.Ş.

Product and service buyer :Customer

Data controller :The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.

ARTICLE 4- PROCESSED SENSITIVE PERSONAL DATA

The following are categories of sensitive personal data processed within the company. While it is always possible to process other sensitive personal data in addition to these data, the policy text will be updated as the number of sensitive personal data processed increases:

- a- Health information
- b- Data on criminal convictions and security measures
- c- Philosophical belief, religion, sect and other beliefs

ARTICLE 5- LIABILITY AND DUTIES

All employees and units of the company provide full and active support to the responsible units for the legal acquisition, processing and storage of sensitive personal data. All employees and units support the responsible units in the implementation of the administrative and technical measures taken within the scope of the policy, in the training of the unit employees, in raising, increasing and monitoring the awareness of the employees, in the prevention of unlawful access to personal data and in the preservation of personal data in accordance with the law.

ARTICLE 6- RULES FOR EMPLOYEES IN PROCESSING SENSITIVE PERSONAL DATA

Employees are obliged to comply with the provisions of the confidentiality undertaking they have signed and the rules that they must comply with under the Law, even if they are not included in this undertaking.

Access to special quality personal data is only possible through printed documents and in the archive section. Access to special quality personal data available in the computer environment can only be possible by defining a user session and password specific to the employee. This identification can only be made by the company official.

In the event that the employee leaves the job, he/she must return all the sensitive personal data information that he/she can access in printed form or that is under his/her control to the data controller. In addition, the authorizations granted to the employee in the computer environment are immediately revoked.

ARTICLE 7- SENSITIVE PERSONAL DATA STORED IN ELECTRONIC ENVIRONMENT

While the sensitive personal data processed by the data controller is kept in printed media as much as possible, it is also possible to keep it in electronic environment as a result of technical necessities and work. In this case, the measures taken by the data controller are as follows:

- a- Access to computers is possible with password entry
- b- Continuous updating of applications in computers and other electronic media
- c- Using up-to-date anti-virus systems on computers
- d- Ensuring network security and application security

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e- Encryption

f- Encrypted transfer of special quality personal data transferred in portable memory, CD, DVD media

ARTICLE 8- SENSITIVE PERSONAL DATA STORED IN PHYSICAL ENVIRONMENT

The measures taken for sensitive personal data stored in the physical environment are as follows:

- a- Keeping the personal data archive in the accounting and human resources section, which is far from general use
- b- Keeping personal data, including sensitive data, in a locked cabinet and giving the key only to the company official and the relevant authorized employee
- c- Use of security cameras for theft prevention and deterrence

ARTICLE 9- TRANSFER OF SENSITIVE PERSONAL DATA

The following rules are complied with in the transfer of special categories of personal data:

- a- Encrypted transfer of special quality personal data that needs to be transferred via media such as Portable Memory, CD, DVD
- b- If it is necessary to transfer the data via paper media, taking necessary precautions against the risks such as theft, loss or viewing of the documents by unauthorized persons and sending the documents in the form of "confidential documents"

ARTICLE 10- PUBLISHING, STORING AND UPDATING THE POLICY

The policy is published with a wet signature (printed paper) and the printed copy is kept within the company. The policy is reviewed as needed and the necessary sections are updated.

ARTICLE 11- EFFECTIVENESS

The policy is deemed to have entered into force after it is signed by the authorized person of the company. If it is decided get cancelled, old copies of the policy with wet signatures are canceled and signed (with an annulment stamp or written cancellation) and kept by the company for at least 5 years.

This Policy entered into force on 26.12.2022. In case in which the entire policy or certain articles of the Policy are updated, the updates become effective on the date they are published. The policy is published on <https://nicole.com.tr/> in its most up-to-date version.

In case of inconsistency between the provisions of the Personal Data Protection Law and other relevant legislation and this Policy, the provisions of the Personal Data Protection Law and other relevant legislation will be applied first.

26.12.2022

AVEC TURİZM OTELCİLİK İNŞAAT TİCARET A.Ş.