



PERSONAL DATA PROCESSING AND PROTECTION POLICY

1. PURPOSE

The term "personal data," which will be defined below (under the heading "2 - Definitions"), is recognized as a fundamental human right in Article 8 of the Charter of Fundamental Rights of the European Union and Article 16 of the Treaty on the Functioning of the European Union. Additionally, personal data is also regulated under Article 20 of the Constitution of the Republic of Turkey, titled "Privacy of Private Life," thus including it among fundamental rights.

Due to this significance, the Law on the Protection of Personal Data No. 6698 ("KVKK") was enacted to protect the fundamental rights and freedoms of individuals, particularly the privacy of personal life, in the processing of personal data belonging to real persons. It was published in the Official Gazette on April 7, 2016, and came into effect.

As WHITE CAD TEK. SAN. VE TİC. LTD. ŞTİ., located at " Gebze OSB, Kemal Nehrozoğlu St. High-Tech Building 3. Floor A10 Teknopark GOSB GEBZE/KOCAELİ TURKEY" we recognize the importance of fundamental human rights and the high value of personal data. In accordance with the obligations set forth by the KVKK, we present this Personal Data Processing and Protection Policy ("Policy") for your information under the Law on the Protection of Personal Data No. 6698.

As the Data Controller under the KVKK, we inform our employees, job candidates, users of the Kareo Application, visitors browsing the website www.whitecad.com, and third parties whose personal data are processed as follows, in accordance with the scope outlined in Article 10 of the KVKK.

2. SCOPE OF THE POLICY AND DATA SUBJECTS

This Policy is prepared for individuals whose personal data are processed by WHITECAD, including those listed in ANNEX 1, whether through automated means or as part of any data recording system using non-automated methods. It will apply to the specified individuals.

In this context, the individuals whose personal data are processed by WHITECAD will be informed about which personal data are being processed, for what purposes, to whom these data may be transferred, what administrative and technical measures have been taken to protect their personal data, what rights they hold regarding their personal data, and the application methods for their requests related to these rights. The aim is to ensure full compliance with the legislation in the processing and protection of personal data conducted by the Company and to safeguard all rights arising from the legislation concerning the personal data of these individuals.

Our Company informs the aforementioned data subjects about the Law by publishing this Policy on its website.

In this context, the data subjects covered by this Policy are listed in ANNEX 1 - List of Relevant Persons.

3. DEFINITIONS



The concepts included in this Policy are defined as follows:

Company/Our Company: Refers to **WHITE CAD TEK. SAN. VE TİC. LTD. ŞTİ.**, located at **"Gebze OSB, Kemal Nehrozoğlu St. High-Tech Building 3. Floor A10 Teknopark GOSB GEBZE/KOCAELİ TURKEY"**

Data Subject/Relevant Person: Refers to the natural person whose personal data is processed. (This includes the individuals listed in ANNEX 1 whose personal data are processed by WHITECAD under this Policy.)

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

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

Sensitive Personal Data/Data: Data related to race, ethnic origin, political opinion, philosophical belief, religion, sect, or other beliefs; attire; membership in associations, foundations, or unions; health; sexual life; criminal convictions and security measures; as well as biometric and genetic data.

Processing of Personal Data: Refers to any operation performed on personal data, whether automated or non-automated, including collection, recording, storage, maintenance, alteration, rearrangement, disclosure, transfer, acquisition, making available, classification, or prevention of use.

Board: Refers to the Personal Data Protection Board.

Law/KVKK: Refers to the Personal Data Protection Law numbered 6698, published in the Official Gazette dated April 7, 2016, numbered 29677.

Policy: Refers to the personal data processing and protection policy established by the Company.

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

Data Recording System: A recording system in which personal data is processed by structuring it according to specific criteria.

Related User: Individuals within the data controller's organization who process personal data, except for those responsible for the technical storage, protection, and backup of the data, or those who process data based on the authority and instructions received from the data controller.

Cookie: Small files stored on users' computers or mobile devices that help store preferences and other information related to the web pages they visit.

Explicit Consent: Refers to consent that is informed, specific to a particular matter, and expressed freely by the individual.



Destruction: Refers to the deletion, destruction, or anonymization of personal data.

Contact Person: The individual designated by the data controller Company to communicate with the Authority regarding obligations under the Law and the secondary regulations derived from it, as reported during the registration process. (The contact person is not authorized to represent the Data Controller. As the title suggests, this person is responsible solely for facilitating communication between the data controller and individuals related to the Authority.)

Record Environment: Any environment where personal data processed fully or partially through automated means or as part of any data recording system, including non-automated methods, is stored.

Definitions not included in this Guide will be based on the definitions provided in the Law and the Regulation.

4. GENERAL PRINCIPLES OF PERSONAL DATA PROCESSING

Personal Data is processed by the Company in accordance with the procedures and principles stipulated in the Law and this Policy. When processing Personal Data, the Company adheres to the following principles:

- Personal Data is processed in accordance with relevant legal regulations and the requirements of the principle of fairness.
- The accuracy and up-to-dateness of Personal Data is ensured. In this context, aspects such as identifying the sources from which the data is obtained, verifying its accuracy, and assessing whether it needs to be updated are carefully taken into account.
- Personal Data is processed for specific, explicit, and legitimate purposes. The legitimacy of the purpose means that the Personal Data processed by the Company is related to its business activities or services and is necessary for these purposes.
- Personal Data is processed in a way that is relevant to the purposes determined by the Company, and the processing of Personal Data that is unrelated or unnecessary for achieving those purposes is avoided. The processed data is limited to what is necessary for the achievement of the purpose. In this context, the Personal Data processed is relevant, limited, and proportionate to the purpose for which it is processed.
- If there is a specific retention period stipulated in the relevant legislation, the Company complies with these periods; otherwise, Personal Data is retained only for as long as necessary for the purposes for which it was processed. If there is no valid reason for the further retention of the data, it will be deleted, destroyed, or anonymized.

5. CONDITIONS FOR PROCESSING PERSONAL DATA

Personal Data cannot be processed without the explicit consent of the Data Subject, in accordance with Article 5 of the Law. However, as stipulated in the same article, Personal Data



may be processed without seeking the explicit consent of the Data Subject if one of the conditions listed below is met.

- **Explicitly Provided for by Laws**

If the processing of Personal Data is explicitly provided for by law, in other words, if there is a clear provision in the relevant legislation regarding the processing of Personal Data, this condition for data processing can be invoked. For example: the requirement to maintain an employee's personnel file under the provisions of the Labor Law or the Occupational Health and Safety Law.

- **Inability to Obtain the Data Subject's Explicit Consent Due to Actual Impossibility**

If a person is unable to express their consent due to actual impossibility, or if their consent is not considered valid, Personal Data may be processed when it is necessary to protect the life or physical integrity of that person or another individual.

- **Directly Related to the Establishment or Performance of a Contract**

Personal Data belonging to the parties of a contract may be processed by the Company without the explicit consent of the Data Subjects, provided that such processing is necessary for the establishment or performance of the contract. For example: processing a person's contact and address information as required for the performance of a distance sales contract resulting from the purchase of a membership in one of WhiteCad's applications from the WhiteCad website.

- **It is Mandatory for the Company (Data Controller) to Fulfil its Legal Obligation**

In cases where processing is mandatory for our company to fulfil its legal obligations, the personal data of the data subject may be processed. For example: obtaining the bank and account information of the employee in order to pay the salary to the employee, asking whether he/she is married, whether his/her dependents, whether his/her spouse is working and social insurance information.

- **Publicisation of Personal Data by the Data Subject Himself**

In the event that the data owner makes his/her personal data public, personal data may be processed by our company, provided that it is limited to the purpose of publicisation.

- **Data Processing is Mandatory for the Establishment or Protection of a Right**

Personal data of the data subject may be processed if data processing is mandatory for the establishment, exercise or protection of a right. For example: using some data for proof in a lawsuit filed by the employee

- **Veri Sahibinin Temel Hak ve Özgürlüklerine Zarar Vermemek Kaydıyla Şirketimizin Meşru Menfaatleri için Veri İşlenmesinin Zorunlu Olması**

Provided that it does not harm the fundamental rights and freedoms of the personal data owner, the personal data of the data owner may be processed if data processing is mandatory for the legitimate interests of our Company. For example: Processing of personal data of



employees to be taken as a basis for their promotions, salary increases or social rights or for the distribution of duties and roles in the process of restructuring the enterprise, provided that it does not harm the fundamental rights and freedoms of employees.

6. PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA

Data relating to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data are sensitive personal data.

Pursuant to Article 6 of the Law, sensitive personal data cannot be processed without the explicit consent of the data subject

Personal data relating to health and sexual life can only be processed by persons or authorised institutions or organisations under the obligation of confidentiality for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, without seeking the explicit consent of the data subject.

In all cases, in the processing of special categories of personal data, adequate measures determined by the board (Personal Data Protection Board) must also be taken

7. DISCLOSURE OF PERSONAL DATA SUBJECTS

In accordance with Article 10 of the Law, our Company informs the data subjects before the processing of Personal Data. In this context, our Company fulfils the Disclosure Obligation during the acquisition of personal data. Within the scope of the disclosure obligation, the notification to be made to Data Subjects includes the following elements.

- Identity of the Data Controller and its representative, if any
- The purpose for which personal data will be processed
- To whom and for what purpose the processed personal data can be transferred
- Method and legal grounds for collecting personal data
- The rights of data subjects listed in Article 11 of the LPPD

Our company provides the necessary information in accordance with Article 20 of the Constitution and Article 11 of the KVKK in case the data subject requests information.

8. TRANSFER OF PERSONAL DATA

- Domestic Transfer of Personal Data

Pursuant to Article 8 of the Law, as a rule, Personal Data cannot be transferred to third parties without the explicit consent of the Data Owner.



However, in the event that there is one of the situations listed in Article 4 of this Policy, where the explicit consent of the Data Owner is not sought, it is possible to transfer Personal Data to third parties in the country without the explicit consent of the Data Owner.

In terms of Personal Data of Special Nature, provided that adequate measures are taken, it is possible to transfer data without seeking the explicit consent of the data owner in the presence of one of the conditions specified in paragraph 3 of Article 6 of the Law.

- Transfer of Personal Data Abroad

Pursuant to Article 9 of the Law, as a rule, Personal Data cannot be transferred abroad without the explicit consent of the Data Owner.

However, in the event that one of the following situations exists, it is possible to transfer Personal Data to third parties abroad without seeking the explicit consent of the Data Owner:

- Existence of one of the situations specified in Articles 4 and 5 of this Policy, where it is stated that the consent of the Data Owner will not be sought
- Adequate protection in the foreign country to which the Personal Data will be transferred
- In the absence of adequate protection, the data controllers in Turkey and in the relevant foreign country undertake in writing to provide adequate protection and the Board's authorisation is obtained

Countries with adequate protection shall be determined and announced by the Board.

Without prejudice to the provisions of international agreements, Personal Data may only be transferred abroad with the permission of the Board by obtaining the opinion of the relevant public institution or organisation in cases where the interests of Turkey or the Data Subject would be seriously damaged.

- Third Parties to whom Personal Data may be Transferred

Your personal data processed by our company in accordance with the law; It can be transferred to the recipient groups specified in Annex-4 below within the framework of the processing conditions specified in Articles 8 and 9 of the KVKK.

In these cases where your personal data is shared, WHITECAD takes the necessary measures to ensure that the party with whom the data is shared carries out processing and transfer activities in accordance with the rules in this Policy and the provisions of the legislation.

9. THE PURPOSES OF PROCESSING YOUR PERSONAL DATA

Your personal data obtained by WHITECAD in accordance with the general principles stipulated in the KVKK; Within the processing conditions specified in Articles 5 and 6 of the KVKK, it is processed for the purposes listed in Annex-3

10. COLLECTION METHODS AND YOUR PERSONAL DATA COLLECTED

Your personal data is collected by WHITECAD, including but not limited to; the forms you have filled in online platforms, the information / documents you have entered / uploaded or



personally transmitted in online platforms, the officers / authorised third parties within the scope of support services, image and / or sound recording devices, closed circuit camera system, verbally by you and through other physical and electronic media, and your personal data collected varies according to the product service you request from WHITECAD, the activities to be carried out by WHITECAD and legal obligations. The categories of personal data collected and the explanations of the relevant data categories are attached to this Policy (Annex-2) The information contained in these personal data categories may vary according to the person whose personal data is processed

11. MEASURES WE TAKE FOR THE SECURITY OF YOUR DATA

WHITECAD takes reasonable technical and administrative measures to ensure the appropriate level of security in order to prevent unlawful processing of your personal data, to prevent unlawful access to your data and to ensure its preservation, and in this context, it takes into account the 'Personal Data Security Guide' published on the website of the Authority and also the Board's 'Decision on Adequate Measures to be Taken by Data Controllers in the Processing of Special Categories of Personal Data' (Decision) dated 31/01/2018 and numbered 2018/10.

12. YOUR RIGHTS AND THE EXERCISE OF THESE RIGHTS

As the relevant person according to Article 11 of the KVKK;

- a) To learn whether your personal data is processed by our company,
- b) To request information about your personal data if it has been processed,
- c) To learn the purpose of processing your personal data and whether it is being used in accordance with that purpose,
- d) To know the third parties to whom your personal data has been transferred, either domestically or internationally,
- e) To request the correction of your personal data if it has been processed incompletely or incorrectly,
- f) To request the deletion or destruction of your personal data if the reasons for processing no longer exist, even if it has been processed in accordance with the KVKK and other relevant legal provisions,
- g) To request that the actions taken in items e) and f) be notified to the third parties to whom your personal data has been transferred,
- h) To object if a result against you arises from the analysis of your personal data solely through automated systems,
- i) To request compensation for any damage you suffer due to the unlawful processing of your personal data.

To submit your requests regarding these rights, you can fill out the "WHITECAD Personal Data Relevant Person Application Form" and send it using one of the methods specified in the application form. Your request will be evaluated and concluded as soon as possible, and in any case, within the period stipulated by the Law. If the process of examining and concluding your application incurs a cost, WHITECAD may charge the fee determined by the Board.



In order for third parties to submit an application on your behalf, you must provide a special power of attorney prepared through a notary for the person who will apply.

Our company may request information from you to determine whether the applicant is you, and may ask you questions regarding your application to clarify the matters stated in the application.

13. UPDATE AND CHANGES

WHITECAD reserves the right to make changes to this Policy in order to provide up-to-date information regarding the practices and legal regulations related to the protection of personal data. The changes made are included as an appendix to this Policy (APPENDIX-5).

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APPENDICES

APPENDIX 1 - Relevant Person List

APPENDIX 2 - Data Categories and Detailed Table

APPENDIX 3 - Purposes of Personal Data Processing

APPENDIX 4 - Categories of Third Parties to Whom Data is Transferred

APPENDIX 5 - Update and Changes Table