

DYDO DRINCO WEB PRIVACY AND PERSONAL DATA PROTECTION PRINCIPLES

1. PURPOSE AND SCOPE

These Privacy and Personal Data Protection Principles (“Principles”) aim to regulate the principles adopted by DyDo Drinco Turkey İçecek Satış ve Pazarlama A.Ş. (referred to as the “Company” or “Data Controller”) with regards to protection of personal data, determine the principles of processing personal data of Customers/Dealers, Candidate Customers/Dealers, Third People, Online Visitors (“Individual Groups”) and inform mentioned individual groups.

2. DEFINITIONS

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

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

Supplier: Refers to a natural or legal person who purchase goods or services.

Business Partner: Refers to economically and legally independent natural persons or legal entities with whom we establish partnerships within the frame of the contractual bond within the scope of maintaining our business activities.

Group Company: Refers to the group of DyDo Drinco Turkey İçecek Satış ve Pazarlama A.Ş., Della Gıda San. ve Tic. A.Ş., Bahar Su San. Tic. A.Ş., Mavidağ Gıda Pazarlama San. ve Tic. in which our company is also included and are directly or indirectly bound to each other.

3. PRINCIPLES FOR PROCESSING PERSONAL DATA

As the company, we process your personal data in accordance with the following principles as the Data Controller.

2.1 Processing in accordance with the Law and the Rule of Honesty

In the processing of your personal data, we act in accordance with the principles introduced by legal regulations and the general rule of trust and honesty. As per this principle, we, as the Data Controller, consider your interests and reasonable expectations whilst trying to achieve the purposes of processing personal data, not abusing our rights and act in accordance with the principle of honesty in the data processing activities of ours.

2.2. Ensuring that Personal Data is Accurate and Up-to-Date When Necessary

Considering your legitimate interest in line with this principle highlighting the importance of the accuracy and currency of personal data, periodic controls and updates are made to ensure the data being processed is accurate and up-to-date and necessary measures are taken in this direction. In this context, systems for checking the accuracy of personal data and making the necessary corrections are created within the Company. Additionally, accuracy of sources where personal is collected is checked and requests emerging from inaccurate personal data are taken into consideration. Therefore, this principle is applied in accordance with the right to request correction of your personal data, which you have as per the Law no. 6698.

2.3. Processing for Specific, Explicit and Legitimate Purposes

Your personal data is processed based on clear, specific and legitimate data processing purposes. In this context, we clearly determine and represent with the articles 5 and 7 of these principles that we ensure our personal data processing activities are clearly comprehensible by relevant persons and which purposes and legal proceeding they base on.

2.4. Being Connected, Limited and Restrained to the Purpose of Processing

Your personal data is processed in a way that it is restrained, connected and limited to the purpose so that envisaged purpose/purposes are achieved and processing of personal data not related to the achievement of the purpose and not required is avoided. Data is not collected or processed for the purposes not available within the scope of this principle and considered to be achieved later.

2.5. Retention for the Period Required for the Purpose Envisaged in the Relevant Legislation or for which it is Processed

Your personal data is retained only for the period envisaged in the relevant legislation or required for the purpose for which it is processed. As the Data Controller, we take and implement relevant administrative and technical measures in this matter. Within this scope, it is determined whether or not the relevant legislation envisages a period of time for the retention of personal data, if so; such period is complied with, if not; personal data is retained for the period of time required for the purpose of processing thereof. In case of expiration of the period or that the reasons requiring the data to be processed cease to exist, and absence of a legal reason allowing it to be processed longer, your personal data is deleted, demolished or anonymized in accordance with the legislation on the protection of personal data.

3. TERMS OF PROCESSING OF PERSONAL DATA

Your personal data may be processed by the company in accordance with the conditions set out below.

3.1. Being Explicitly Prescribed by Laws

The basic rule is not to process personal data without explicit consent of relevant persons and in cases where personal data is stipulated by laws to be processed in accordance with this exception, your personal data may be processed.

3.2. Inability to Obtain Explicit Consent of The Relevant Person Due to Actual Impossibility

Your personal data may be processed if it is mandatory for your personal data to be processed to protect the life or physical integrity of the relevant person who is unable to express his/her consent due to actual impossibility or whose consent cannot be considered valid, and of another person. Accordingly, in cases where consent cannot be expressed or is not valid, personal data is envisaged to be processed provided that personal life or physical integrity is protected.

3.3. Being Directly Related to Contract Establishment or Execution

Your personal data may be processed if it is necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the establishment or execution of the contract. In the case of processing personal data related to the parties for the purpose of fulfilling the obligations set out in a valid contract with this condition, there will also be no need for explicit consent.

3.4. The Company's Fulfilling Its Legal Obligation

Your personal data may be processed if processing is mandatory to fulfill legal obligations as the data controller.

3.5. Personal Data Being Publicly Available

Your personal data may be processed if it has been made public by you, meaning it has been shared with the public by you. At this point, it is accepted that the legal benefit that should be protected has disappeared.

3.6. Data Processing Being Mandatory for the Establishment or Protection of a Right

Your personal data may be processed if it is mandatory to be processed for the establishment, use or protection of a right.

3.7. Processing of Data Based on Legitimate Interest

Your personal data may be processed if it is necessary to be processed for the legitimate interests of the company. Accordingly, personal data may be processed for the purposes such as employee promotion, salary increase or regulation of social rights provided that fundamental rights and freedoms of employees are not damaged. On the other hand, even in such cases, the basic principles of protection of personal data will be followed and the balance of interests of the relevant person will be observed.

3.8. Processing Based on Explicit Consent

It is the essential rule to process personal data based on explicit consent, whereas explicit consent cannot be based on in case of presence of other conditions specified in this article. Otherwise, abuse of the right may be mentioned. In this context, your personal data is processed on the basis of express consent if it cannot be processed on the basis of any of the terms set out in these principles.

4. CATEGORIZATION OF PERSONAL DATA

| Data Owner | Data Categories |
|---------------------------|--|
| Candidate Employee | ID |
| | Contact |
| | Transaction Security |
| | Visual and Audial |
| | Professional Experience |
| | Health |
| | Penal Conviction |
| Customer/Dealer | Other (Such as other information in CV) |
| | ID |
| | Contact |
| | Customer Transaction |
| | Physical Environment Security |
| | Transaction Security |

| | |
|----------------------------------|--------------------------------------|
| Candidate Customer/Dealer | ID |
| | Contact |
| | Physical Environment Security |
| | Transaction Security |
| Third Party | ID |
| | Contact |
| | Physical Environment Security |
| | Legal Proceeding |
| | Transaction Security |
| Online Visitor | ID |
| | Contact |
| | Marketing |
| | Transaction Security |

5. PURPOSES OF PROCESSING PERSONAL DATA

Personal Data may be processed at the Company with the following purposes depending on the relevant individual groups within the scope of the terms of processing personal data specified in the articles 5 and 6 of the Law on the Protection of Personal Data no. 6698 (“Law no. 6698”).

5.1. CANDIDATE EMPLOYEE

Personal Data of Candidate Employees may be processed within the scope of the personal data processing terms stipulated in the articles 5 and 6 of the Law on the Protection of Personal Data no. 6698 (“Law no 6698”) with the purposes of candidate employee selection and management of selection processes, planning and execution of human resources processed, management of personnel activities, fulfillment of obligations arising from the legislation, planning and execution of interests and management of personnel procurement processes.

5.2. CUSTOMER/DEALER

Personal Data of Customers/Dealers is processed within the scope of the personal data processing terms stipulated in the articles of 5 and 6 of the Law on the Protection of Personal Data no. 6698 with the purposes of management of finance and accounting affairs, management of contractual processes, fulfillment of obligations arising from the legislation, management of communication activities, maintenance of activities to ensure business continuity, follow-up and inspection of business activities, management of customer relations management processes, maintenance of activities to ensure loyalty to the company, products and services, management of activities to ensure customer satisfaction, securing physical environment, management of the goods and services processed the company has undertaken and maintenance of support activities , management of supply chain processes, informing officials, corporations and institutions and carrying out advertisement activities.

5.3. CANDIDATE CUSTOMER/DEALER

Personal Data of Candidate Customers/Dealers is archived within the scope of the personal data processing terms stipulated in the articles of 5 and 6 of the Law on the Protection of Personal Data no. 6698 with the purposes of fulfillment of obligations arising from the legislation, sales of products and services, management of communication activities, securing physical environment, maintaining communication activities, management of requests and complaints and maintaining customer satisfaction-related activities.

5.4. THIRD PARTY

Personal Data of Third Parties may be processed within the scope of the personal data processing terms stipulated in the articles of 5 and 6 of the Law on the Protection of Personal Data no. 6698 with the purposes of fulfillment of obligations arising from the legislation, sales of products and services, securing physical environment, management of finance and accounting affairs in accordance with the legislation, maintenance of legal affairs and contractual processes, follow-up and execution of legal proceedings, management of inspection activities, securing physical environment and informing officials, corporations and institutions.

5.5. ONLINE VISITOR

Personal Data of Online Visitors may be processed within the scope of the personal data processing terms stipulated in the articles of 5 and 6 of the Law on the Protection of Personal Data no. 6698 with the purposes of management of advertisement, promotion and marketing activities, maintenance of communication activities, management of efforts to develop products and services and fulfillment of legal obligations.

6. TRANSFER OF PERSONAL DATA

Your personal data may be transferred to our domestic and foreign based group companies, business partners, suppliers, legally authorized public institutions and legally authorized natural persons in a limited way within the scope of the personal data processing terms and purposes stipulated in the articles 8 and 9 of the Law no. 6698 along with the principles and purposes set out in the articles 3 and 5 of these Principles.

7. WAYS AND LEGAL REASON OF COLLECTING PERSONAL DATA

Your personal data transferred to the Company is processed as follows.

7.1. CANDIDATE EMPLOYEE

Personal data of candidate employees is processed provided that it is directly related to the establishment or execution of a contract stipulated in the article 5 of the Law no. 6698, that personal data of parties to such contract is required to be processed and it is mandatory to allow the data controller to fulfill its legal obligation or, without prejudice to the fundamental rights and freedoms of the relevant person, based on the legal reason requiring the personal data to be processed for legitimate interests of the data controller; while your sensitive personal data may be processed by obtaining your explicit consent as stipulated in the article 6 of the Law no. 6698; provided that it is a part of an automatic, partially automatic or any data recording system by obtaining such data from the person himself/herself or a third party, filling out an electronic application form, filling out a physical form.

7.2. CUSTOMER/DEALER

Personal data of Customer/Dealer is processed provided that it is explicitly envisaged by the law as stipulated in the article 5 of the Law no. 6698, that personal data of parties to such contract is required to be processed and it is mandatory to allow the data controller to fulfill its legal obligation or, without prejudice to the fundamental rights and freedoms of the relevant person, based on the legal reason requiring the personal data to be processed for legitimate interests of the data controller, to establish, use or protect a right or, without prejudice to the fundamental rights and freedoms of the relevant person, based on the legal reason requiring the personal data to be processed for legitimate interests of the data controller; while your sensitive personal data may be processed by obtaining explicit consent as stipulated in the article 6 of the Law no. 6698; while your sensitive personal data may be processed, as stipulated in the article 6 of the Law no. 6698; by means of obtaining such data from the person himself/herself or a third party with written or verbal data transfer means on physical and electronic environment provided that it is a part of an automatic, partially automatic or any data recording system.

7.3. CANDIDATE CUSTOMER/DEALER

Personal data of Candidate Customer/Dealer is processed provided that it is explicitly envisaged by the law as stipulated in the article 5 of the Law no. 6698, that personal data of parties to such contract is required to be processed and it is mandatory to allow the data controller to fulfill its legal obligation or, without prejudice to the fundamental rights and freedoms of the relevant person, based on the legal reason requiring the personal data to be processed for legitimate interests of the data controller, to establish, use or protect a right or, without prejudice to the fundamental rights and freedoms of the relevant person, based on the legal reason requiring the personal data to be processed for legitimate interests of the data controller by means of obtaining such data from the person himself/herself or a third party with written or verbal data transfer means on physical and electronic environment provided that it is a part of an automatic, partially automatic or any data recording system.

7.4. THIRD PARTY

Personal data of Third Parties is processed provided that it is explicitly envisaged by the law as stipulated in the article 5 of the Law no. 6698, that personal data of parties to such contract is required to be processed and it is mandatory to allow the data controller to fulfill its legal obligation or, without prejudice to the fundamental rights and freedoms of the relevant person, based on the legal reason requiring the personal data to be processed for legitimate interests of the data controller, to establish, use or protect a right or, without prejudice to the fundamental rights and freedoms of the relevant person, based on the legal reason requiring the personal data to be processed for legitimate interests of the data controller by means of obtaining such data from the person himself/herself or a third party with written or verbal data transfer means on physical and electronic environment provided that it is a part of an automatic, partially automatic or any data recording system.

7.5. ONLINE VISITOR

Personal data of Online Visitors is processed by not doing any harm to the fundamental rights and freedoms of the relevant person as stipulated by the Law on Regulation of Publications on the Internet and Suppression of Crimes

Committed by means of Such Publications no. 5651 and the article 5 of the Law no. 6698 provided that it is mandatory to allow the data controller to fulfill its legal obligation or, without prejudice to the fundamental rights and freedoms of the relevant person, based on the legal reason requiring the personal data to be processed for legitimate interests of the data controller, to establish, use or protect a right or, without prejudice to the fundamental rights and freedoms of the relevant person, based on the legal reason requiring the personal data to be processed for legitimate interests of the data controller by means of obtaining such data from the person himself/herself or a third party with written or verbal data transfer means on physical and electronic environment provided that it is a part of an automatic, partially automatic or any data recording system.

8. SAFETY OF PERSONAL DATA

The Company takes reasonable measures to ensure that personal data is secured and protected against illegal processing, and to prevent data loss, intentional deletion thereof or any damage thereto.

All kinds of technical and physical measures are taken to prevent other persons apart from those who are authorized from accessing to personal data. Within this scope, especially the authorization system must be structured in a way that nobody can access to information more than necessary.

The Company carries out and has necessary inspections carried out within its corporation or institution to ensure the implementation of the provisions of Law no. 6698.

9. COMMITMENTS REGARDING THIRD PARTY PERSONAL DATA

The Individuals Group agrees and consents that personal data of 3rd parties transferred by Individual Groups can be processed by the Company. The Relevant Individual Group guarantees that it has informed and obtained relevant permits for the persons to whom they are transferred and information in accordance with the Law no. 6698. Otherwise, damages to arise will remain within the relevant individual group.

10. PROCEDURES AND PRINCIPLES OF APPLICATION

Should you, as the relevant person, have any requests regarding your rights specified in the article 11 of the Law no. 6698, you can make an application with your application satisfying the minimum conditions set out by the Communiqué Regarding the Procedures and Principles for Data Controller to our KEP address dydodrinco@hs03.kep.tr, our e-mail address kvkk@dydodrinco.com.tr with your e-mail address that is registered on our system and can be proved to belong to you or with a message you would transmit with a secure e-signature or written and wet signed application you would send to our address Kısıklı Mah. Alemdağ Caddesi Masaldan İş Merkezi No:60 Kat: 2-3 D: 5-6-7-8 Büyükçamlıca – Üsküdar/İstanbul in person or by notary public. As the Company, we will conclude your application within the shortest time and within thirty days at the latest, depending on the nature of your request. However, should the transaction require an additional cost, tariff price specified by the Board of Personal Data Protection shall be charged.

As the relevant person, you will have the following rights;

- a) Learn whether personal data has been processed or not,
- b) Request information if personal data has been processed,
- c) Learn the purposes for which personal data is processed and whether it is used in accordance with such purposes,
- d) Learn third parties to whom personal data has been processed in and outside the country,
- e) Request correction if personal data is processed insufficiently or erroneously,
- f) Request deletion or destruction of personal data within the scope of the conditions stipulated in the article 7 of the Law,
- g) Request the transactions performed as per the clauses (d) and (e) to be notified to third parties it has been transferred to,
- h) Object to a result to reveal against the relevant person by analyzing the processed data by means of exclusively automatic systems,
- i) Request compensation in the event that a damage arising from the illegal processing of the personal data

