PERSONAL DATA PROTECTION AND PROCESSING POLICY

Personal Data Protection and Processing Policy

1. Introduction

Aselsan Malatya Elektronik Sanayi ve Ticaret Anonim Şirketi (“Aselsan Malatya”) attaches utmost importance to the lawful processing and protection of personal data in accordance with Law No. 6698 on the Protection of Personal Data (the “Law”). Personal data collected during its planning and operations is protected under this Personal Data Protection and Processing Policy (the “Policy”).

1.1. Purpose of the Policy

The purpose of this Policy is to explain, in accordance with the Law and its objectives, the systems governing the processing and protection of personal data, to inform persons whose data is processed by Aselsan Malatya and to ensure full compliance with legal requirements and protection of data subjects’ rights.

1.2. Entry into Force

The current version of this Policy is made accessible to relevant persons at www.aselsanmalatya.com.tr. Aselsan Malatya reserves the right to amend the Policy.

1.3. Scope and Data Subjects

This Policy applies to personal data processed automatically or non-automatically as part of a data filing system by Aselsan Malatya, relating to the following data subject categories:

Shareholders	Natural persons holding shares in Aselsan Malatya.
Partners, executives and employees of business partners	Natural persons within the business relationships in which Aselsan Malatya participates, including its partners, suppliers and their employees or representatives.
Job applicants	People applying for jobs by any means, or providing resumes and related information.
Interns, internship applicants, scholarship recipients and applicants	People who have applied for or participated in internships, vocational training, other education or scholarship programs.
Coordinating teachers and academic staff	People who supervise students undertaking internships, vocational training or other educational programs.
Customers and prospective customers	Natural persons who use, have used or wish to use goods or services offered by Aselsan Malatya.
Visitors	Natural persons visiting Aselsan Malatya facilities or website.
Third parties	Other natural persons not included in the above categories.

1.4. Implementation

This Policy establishes concrete rules for Aselsan Malatya practices within the framework of applicable legislation.

2. Processing and Transfer of Personal Data

2.1. General Principles for Processing Personal Data and Special Categories of Personal Data

Aselsan Malatya processes personal data in accordance with the principles and procedures set forth in the Law and this Policy.

2.2. Conditions for Processing Personal Data and Special Categories of Personal Data

Aselsan Malatya processes personal data under the conditions stated in the Law and applies the safeguards prescribed by the Personal Data Protection Authority for special-category personal data.

2.3. Conditions for Domestic and International Transfers

Aselsan Malatya transfers personal data in accordance with the statutory conditions and principles, taking necessary safeguards and, where legally permitted, may transfer personal data, including special-category data, to third parties.

3. Categories, Purposes and Recipients of Personal Data

3.1. Categories of Personal Data

The following categories of personal data may be processed, subject to the conditions in the Law:

Identity information	Name, surname, Turkish national identity number, identity-document information, nationality, date and place of birth, gender, signature, tax or social security numbers, vehicle registration and similar identification data.
Contact information	Telephone numbers, physical or e-mail address, fax numbers, IP addresses and similar data.
Location information	GPS location data and travel information processed in the course of operations.
Transaction security information	Personal data processed to ensure technical, administrative, financial, legal or commercial security.
Family members and relatives	Information about family members, close relatives and people to be contacted in an emergency, where necessary to protect legal or other interests.
Physical premises security	Entry and exit records, camera footage, fingerprint records and security checkpoint records relating to physical premises.
Financial information	Customer numbers, IBAN, payment-card information, financial condition, assets, income and other data arising from financial or contractual dealings.
Visual and audio information	Photos, image and audio recordings, copies of identity documentation and other records that include personal data.
Personnel information	Employment records and other personal data necessary for employment relationships and obligations.
Legal transaction information	Personal data processed to establish and protect legal rights or comply with statutory obligations.
Special-category personal data	Data specified under Article 6 of the Law.
Request and complaint management	Requests and complaints submitted to Aselsan Malatya and personal data involved in evaluating them.
Customer information	Personal data acquired or generated regarding customers in the course of business.
Customer transaction information	Records relating to use of products and services and associated instructions or requests.
Job applicant information	Information relating to applicants for employment.
Intern and scholarship applicant information	Personal data relating to applications for internships, vocational education or scholarships.

Internal audit information	Personal data processed in connection with internal audits and examinations.

3.2. Purposes of Processing and Transfer

Aselsan Malatya may process personal data for the following purposes, without limitation, in compliance with the Law:

- Planning and implementing human resources policies.
- Fulfilling obligations arising from legislation, regulations, purchase orders and contracts accurately and completely.
- Planning, conducting and managing commercial partnerships and strategies.
- Checking the legal, commercial and physical security of shareholders, affiliates, business partners and other stakeholders.
- Planning, implementing and managing corporate operations, administration and communication.
- Maintaining information security at the highest possible level and creating databases.
- Developing website services and resolving website errors.
- Communicating with applicants and managing their requests and complaints.
- Planning, conducting and managing events.
- Managing relationships with suppliers and other stakeholders.
- Planning, conducting and managing recruitment.
- Financial reporting, risk management and associated monitoring.
- Conducting legal proceedings and monitoring and protecting corporate reputation.
- Planning, implementing and managing investor relations.
- Providing information to authorized authorities and institutions.
- Creating and monitoring visitor records.

3.3. Recipients of Personal Data

Subject to the requirements of the Law, personal data may be transferred to the shareholders of Aselsan Malatya, its subsidiaries and affiliates, other business partners, suppliers, public authorities and institutions and third parties to the extent relevant and legally permitted.

4. Collection, Legal Grounds, Destruction and Retention

4.1. Collection Methods and Legal Grounds

Personal data may be collected verbally, in writing or electronically through means including management, call centers, the Aselsan Malatya website and mobile applications and processed for the purposes and legal grounds described in this Policy.

4.2. Destruction of Personal Data

Where the reasons requiring processing cease to exist, Aselsan Malatya destroys personal data ex officio or on request under the procedures and conditions specified in the Law. Details are set out in the Personal Data Retention and Destruction Policy.

4.3. Retention Period

Aselsan Malatya retains personal data for periods stated in law, or if no specific period applies, for periods required by its activities. Once the relevant period ends, data is destroyed. Detailed principles are provided in the Personal Data Retention and Destruction Policy.

5. Protection of Personal Data

Aselsan Malatya protects personal data in accordance with the Law. It implements appropriate technical and administrative safeguards and audits to prevent unlawful processing or access and to ensure secure retention. If personal data is obtained unlawfully by third parties, Aselsan Malatya acts in accordance with the statutory notification procedures and deadlines.

6. Data Subjects' Rights and Their Exercise

6.1. Information Provided to Data Subjects

Aselsan Malatya informs data subjects about the purposes, methods, principles, retention and destruction of their data in accordance with the Law. The Personal Data Processing Privacy Notice is available at www.aselsanmalatya.com.tr.

6.2. Rights Under the Law

The notices concerning processing, retention and destruction also explain the rights available to data subjects under the Law.

6.3. Exercising Data Subjects' Rights

Under Article 13(1) of the Law, requests may be submitted in writing or using other methods specified by the Personal Data Protection Authority.

To exercise your rights under Article 11 of Law No. 6698, complete the application form available at www.aselsanmalatya.com.tr and submit a signed copy by e-mail to kvk@aselsanmalatya.com.tr, in person with identity-verification documents or through a notary to Aselsan Malatya Elektronik Sanayi ve Ticaret Anonim Şirketi, 2. OSB Mah. 2. Cad. No:18/2 Yeşilyurt/Malatya, Türkiye, or by other legally permitted methods. The form may also be sent with a secure electronic signature to the registered electronic mail (KEP) address aselsanmalatya@hs01.kep.tr.

6.4. Procedure and Time Limit for Responding to Applications

Aselsan Malatya responds to requests as soon as possible and no later than thirty days depending on their nature, normally free of charge. If the procedure entails additional costs, fees may be charged in accordance with the schedule set by the Personal Data Protection Authority. Aselsan Malatya may reject a request with reasons or accept it and take the required steps. The response is communicated in writing or electronically.

6.5. Complaints to the Personal Data Protection Authority

Where a request is refused, the response is considered insufficient or no response is provided within the relevant period, the data subject may complain to the Personal Data Protection Authority within thirty days of learning the response and, in any event, within sixty days of the original application.

7. Updates, Compliance and Amendments

Aselsan Malatya reserves the right to amend this Policy and related policies.