

ES GROUP DENİZCİLİK SAN. VE TİC. A.Ş.

DATA SUBJECT REQUEST MANAGEMENT PROCEDURE

TABLE OF CONTENTS

1. Purpose |
2. Definitions |
3. Scope and Application |
4. Update |
5. Related Policies and Procedures

1. Purpose

This "Data Subject Request Management Procedure" sets out the method to be applied within our Company when a data subject exercises their right of application pursuant to Article 13 of the Personal Data Protection Law.

2. Definitions

Definitions not included herein shall be used as defined in the Law and secondary regulations.

- Explicit Consent: Consent related to a specific subject, based on information and expressed with free will.
- Data Subject: The natural person whose personal data is processed.
- Law: Personal Data Protection Law No. 6698.
- Authority: Personal Data Protection Authority.
- Data Controller (Company): The natural or legal person who determines the purposes and means of processing personal data and is responsible for establishing and managing the data filing system.
- Data Controller Contact Person: The authorised person who takes and finalises required actions in formal and internal audit processes; responds to applications from data subjects; informs the Company's units authorised in data protection in case of data breaches; monitors changes and amendments in data processing activities reported by the Data Controller and relevant units; keeps the inventory up to date; carries out duties specified in Company policies, procedures and instructions; and ensures communication with the Authority.
- Data Officer: The Company employee who creates the detailed inventory of the Data Controller; monitors changes and amendments in data processing activities; keeps the inventory up to date; communicates potential changes to the Data Controller Contact Person; and carries out duties specified in Company policies, procedures and instructions.

3. Scope and Application

Pursuant to Article 13 of the Law, data subjects are required to first submit their requests regarding the application of the Law to the Data Controller. In line with the "Communiqué on Procedures and Principles for Application to the Data Controller" published by the Authority, the Company manages data subject requests as described below.

3.1. Right of Application

Natural persons whose personal data is processed have the right to apply to the Data Controller. Data subjects may exercise this right provided that they make their applications in Turkish.

3.2. Application and Response Process

1. The data subject may submit their requests within the scope of the rights specified in Article 11 of the Law in writing, or by using a registered electronic mail (KEP) address, secure electronic signature, mobile signature or the electronic mail address previously notified to the Data Controller and registered in the Data Controller's system, or through a software or application developed for the purpose of the application. The data subject may also apply by completing the "Application Form" to be provided/announced by the Data Controller.
2. The application must include: the applicant's name, surname and signature if the application is in writing; for Turkish citizens, the Turkish ID number, for foreigners, their nationality, passport number or ID number if available; the address for notification or business address; the electronic mail address, telephone and fax number for notification if available; and the subject of the request. Information and documents related to the subject are attached to the application.
3. For written applications, the date on which the document is delivered to the Data Controller or its representative is the application date. For applications made by other methods, the date on which the application reaches the Data Controller is the application date.
4. All applications made to the Data Controller are forwarded to and processed by the Data Controller Contact Person. If the application reaches any employee of the Data Controller, the receiving person shall immediately forward the application to the Data Controller Contact Person.
5. The Data Controller Contact Person informs the Company's units authorised in data protection.
6. The Data Controller Contact Person conducts a comprehensive assessment together with the Company's senior management and units authorised in data protection, within the framework of the Law, applicable legislation and the Company's related policies and procedures. For the purpose of locating the personal data subject to the application within the Company, contact is made with internal units such as Administrative Affairs, Security, Information Systems and Human Resources. The data subject's application is responded to with positive or negative justification based on the findings obtained and the assessment conducted.
7. The Data Controller concludes the data subject's request within 30 days of the date of notification, based on the outcome of the assessment. Where the process requires additional cost, a processing fee of 1 Turkish Lira per page may be charged for each page exceeding 10 pages. Where the response to the application is provided on a storage medium such as CD or flash drive, the fee requested by the Data Controller may not exceed the cost of the storage medium. If the application originates from a mistake of the Data Controller, the fee collected is refunded to the applicant. No fee is charged for written responses up to ten pages.

8. The response letter shall include information about the Data Controller or its representative; the applicant's name, surname, Turkish ID number (for Turkish citizens), nationality, passport number or ID number (for foreigners), notification address or business address, electronic mail address, telephone and fax number if available; the subject of the request; and the Data Controller's explanations regarding the application.
9. If the data subject's request is accepted, the Data Controller Contact Person notifies the person through the method indicated by the person or as specified in the "Application Form under the Personal Data Protection Law No. 6698" and fulfils the requirements of the request.
10. If the data subject's request is rejected, the Data Controller Contact Person states the reasons and notifies the response in the manner specified in the "Application Form".
11. After the application is concluded, the Data Controller Contact Person submits a detailed incident status report to the Company's units authorised in data protection.

3.3. Rights of the Data Subject

Within the framework of Article 11 of the Law, the data subject has the right to apply to the Data Controller and request:

12. To learn whether their personal data has been processed; and if processed, to request information regarding such processing.
13. To learn the purpose of processing personal data and whether they are used in accordance with their purpose.
14. To know the third parties to whom personal data has been transferred domestically or abroad.
15. To request correction of personal data that is incomplete or inaccurate.
16. To request deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of the Law; and to request that the operations performed in this scope be notified to third parties to whom personal data has been transferred.
17. To object to the emergence of a result against the person themselves by analysing the processed data exclusively through automated systems.
18. To claim compensation for the damage incurred in case of damage due to unlawful processing of personal data.

3.4. Exceptions in the Law Where the Procedure Cannot Be Applied

The Data Controller may process personal data without seeking explicit consent if any of the following conditions exist. Accordingly, the existence of at least one of these conditions is sufficient for the rejection of a data subject application:

19. Where explicitly stipulated by law (tax legislation, labour legislation, commercial legislation, etc.).
20. Where it is mandatory for the protection of life or physical integrity of the person themselves or another person who is unable to express their consent due to actual impossibility or whose consent is not legally valid.
21. Where processing of personal data of the parties to a contract is necessary, provided that it is directly related to the establishment or performance of a contract.
22. Where it is mandatory for the Data Controller to fulfil its legal obligation.
23. Where the personal data has been made public by the data subject themselves.
24. Where data processing is mandatory for the establishment, exercise or protection of a right.
25. Where data processing is mandatory for the legitimate interests of the Data Controller, provided that it does not infringe the fundamental rights and freedoms of the data subject.

3.5. Complaint Process

The data subject may lodge a complaint with the Authority if their application to the Data Controller is rejected, the response is deemed insufficient, or no response is provided within the statutory period. The complaint must be lodged within 30 days of learning the response, or in any case within 60 days of the application date.

4. Update

This Procedure shall be reviewed and recorded once a year regardless of whether changes in its content are required due to corporate or legal reasons. The most current version shall be published on the Data Controller's website.

5. Related Policies and Procedures

- Policy on Protection and Processing of Personal Data
- Personal Data Retention and Disposal Policy
- Policy on Processing and Protection of Special Categories of Personal Data
- Information Systems General Standards and Security Policy
- Crisis Response Procedure