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## PERSONAL DATA PROTECTION POLICY

### 1. PURPOSE

The purpose of the Personal Data Protection Policy ("Policy") is to establish the principles regarding the storage of personal data belonging to the current and potential customers, business partners, visitors, shareholders, company executives, employee candidates, employees of institutions with which cooperation is carried out, and other third parties related to Labiance International Tourism and Organization Inc. ("LaBiance Tourism Inc."). It also aims to ensure compliance with Article 20 of the Constitution of the Republic of Turkey, Law No. 6698 on the Protection of Personal Data ("Law"), and relevant regulations, and to determine the necessary procedures and systems for data destruction. In line with its corporate vision and mission, LaBiance Tourism Inc. aims to achieve the following:

- Compliance with legal requirements
- Protection of corporate reputation
- Increasing awareness regarding the protection of personal data

### 2. SCOPE

The provisions and principles outlined in this policy apply to all types of information and documents containing personal data, whether physical or digital, that relate to identified or identifiable natural persons. This policy covers the processing of personal data of third-party employees working on behalf of LaBiance Tourism Inc., current and potential customers, business partners, visitors, employee candidates, and employees.

### 3. DEFINITIONS

- **Policy:** Personal Data Protection Policy
- **Law:** Law No. 6698 on the Protection of Personal Data
- **Personal Data:** Personal data refers to any information related to an identified or identifiable natural person.
- **Special Category Personal Data:** Special category personal data includes information on an individual's race, ethnic origin, political opinion, philosophical beliefs, religion, sect, or other beliefs, attire, association, foundation or union membership, health, sexual life, criminal convictions, security measures, as well as biometric and genetic data as specified in the law.
- **Processing of Personal Data:** Refers to any operation performed on personal data, whether automated or non-automated, such as collection, recording, storage, preservation, alteration, reorganization, disclosure, transfer, retrieval, classification, or prevention of its use.

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- **Data Controller:** The data controller refers to 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.
- **Data Controllers' Registry:** The Data Controllers' Registry (VERBIS) is a registration system in which data controllers are required to register and declare information regarding their data processing activities.

#### 4. PRINCIPLES OF PERSONAL DATA PROTECTION

During its service processes, LaBiance Tourism Inc. classifies data as personal data and special category personal data as defined by law. The data is processed, securely stored, and transferred to third parties in accordance with the following principles:

##### 4.1. Confidentiality

The processing of personal data within LaBiance Tourism Inc. is conducted with full confidentiality. The company prevents unauthorized access to personal data to the extent possible and implements all necessary technical and administrative measures, conducting periodic audits accordingly.

##### 4.2. Compliance with Law and Integrity

LaBiance Tourism Inc. collects and processes personal data in compliance with the law and in accordance with principles of integrity.

##### 4.3. Accuracy and Timeliness

Personal data processed by LaBiance Tourism Inc. is kept accurate and, when necessary, updated. The company takes the necessary measures to ensure that incorrect or outdated data is corrected, amended, updated, or deleted.

##### 4.4. Clarity and Transparency

LaBiance Tourism Inc. processes personal data for specified, clear, and legitimate purposes, and does not process data for purposes other than those made transparent to the data subject. A legitimate purpose means that the data processed by the company is connected to and necessary for the work or service it provides.

##### 4.5. Relevance, Limitation, and Proportionality

Personal data processed by LaBiance Tourism Inc. is limited to the stated purpose and processed proportionally to the extent necessary. Personal data is not collected for future possible purposes, nor is it processed or transferred in a manner incompatible with its original purpose. In accordance with the principle of data minimization, only the data necessary for the specified purpose is collected and retained.

##### 4.6. Limited Retention Period

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Once the primary purpose for processing personal data ceases to exist and the data is no longer needed, the personal data is deleted, destroyed, or anonymized. If a retention period for data is specified in the law, the data is retained in compliance with that period and is subsequently deleted, destroyed, or anonymized as outlined in the Personal Data Retention and Destruction Policy.

#### **4.7. Choice and Consent**

LaBiance Tourism Inc. fully informs data subjects about the processing of their personal data and, where necessary, obtains their consent. The data subject has the right to withdraw their consent at any time or to make requests regarding their data. Once consent is withdrawn, LaBiance Tourism Inc. handles the data in accordance with the other principles specified in this policy.

#### **5. ENFORCEMENT**

In case of violation of this policy, the Personal Data Protection Board must be informed immediately. Upon investigation, if a violation is determined, the Board may require the data controller to rectify the violation, notifying the relevant parties. This requirement must be fulfilled without delay and within 30 days at the latest. Failure to comply with the Board's decision may result in administrative fines within the limits specified by the law. LaBiance Tourism Inc. reserves the right to apply disciplinary sanctions, terminate employment contracts, suspend or seek legal remedies against individuals who violate the policy or fail to meet other personal data protection requirements.

#### **6. RESPONSIBILITY OF DATA PROCESSOR REGARDING DATA SECURITY**

According to Article 12 of the Personal Data Protection Law, "In cases where personal data is processed on behalf of the data controller by another natural or legal person, the data controller shall be jointly responsible with those persons for taking the necessary security measures." Therefore, the data processor is jointly responsible with the data controller for preventing unlawful processing of personal data, preventing unauthorized access, and ensuring the preservation of personal data by taking appropriate technical and administrative measures. In case of data security breaches, the data controller has the right to recourse to the data processor based on their fault.

#### **7. REVIEW**

This policy must be reviewed annually or whenever necessary.

#### **8. DISTRIBUTION OF THE POLICY**

This policy must be published in a manner accessible to all employees of LaBiance Tourism Inc., and all employees must be informed accordingly.

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