

BERKO İLAÇ VE KİMYA SAN.A.Ş.
PERSONAL DATA SECURITY POLICY AND PROCESSING PROCEDURE

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1. INTRODUCTION

Berko İlaç ve Kimya Sanayi A.Ş. ("Berko") pays special attention to the legal protection and processing of Personal Data in accordance with the PDP Law No. 6698 and aims to make the Data Security Policy (the "Policy") a company policy. The subject of the Policy is the protection of private personal data belonging to our employee candidates, contract manufacturer employees, distributor employees, company employees from whom we purchase services, visitors, customers by Berko. The activities carried out regarding the protection of the personal data of our employees are carried out within the framework of the provisions of "*Policy regarding the Security of Personal Data of Berko Employees*" organized in parallel with the principles in this Policy.

2. PURPOSE AND BASIS

The main purpose of this Policy is to make explanations about the personal data processing activities carried out by Berko in accordance with the current legislation in accordance with the Constitution and the PDP Law and the principles for the protection of personal data, and it is aimed to provide transparency by informing the people whose sensitive personal data is processed by Berko, especially our employee candidates, contract manufacturer employees, distributor employees, company employees from whom we purchase services, visitors and customers within the framework of privacy.

3. SCOPE

Within the scope of the Policy, the data subjects whose personal data are processed are categorized as follows: it shall be applied within the scope of all third parties, including, but not limited to our employee candidates, contract manufacturer employees, distributor employees, company employees from whom we purchase services, visitors, customers as well as suppliers, guarantors, victims/rights holders, family members, etc., whose personal data are processed even though they are not defined in the Policy. For Berko employees, "*Policy regarding the Security of Personal Data of Berko Employees*" has been arranged. This Policy shall be applied for the above-mentioned persons if Berko processes the personal data of these relevant persons.

4. DEFINITIONS

The definitions used in this Policy are listed below in the light of PDP:

- a) Explicit consent: Consent related to a specific subject, based on information and explained by free will,
- b) Anonymization: Even if the personal data is matched with other data, not be able to be associated with an identified or identifiable real person in any way,
- c) Employee Candidate: The real person whose personal data is processed,
Personal data: All kinds of information about an identified or identifiable real person,
- d) Processing of personal data: All kinds of operations performed on the data such as obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing use of personal data completely or partially automatically or by non-automatic means provided that it is a part of any data recording system,
- e) KVK: The Personal Data Protection Board,
- f) Institution: The Institution for the Protection of Personal Data,
- g) Data processor: A natural or legal person who processes personal data on behalf of the data controller on the basis of the authority granted by the data controller,

ğ) Data recording system: The registration system in which personal data is processed by structuring according to certain criteria,

h) Data controller: 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,

i) Representative of the data controller: The real person who will represent Berko before the Institution as the Head of the Berko Personal Data Protection Unit,

i) Personal health data: All kinds of health information related to an identified or identifiable real person,

i) Sensitive personal data: Data about the race, ethnic origin, political thought, philosophical belief, religion, sect or other beliefs of people, disguise and clothing, association, foundation or trade union membership, health, sexual life, criminal conviction and security measures, as well as biometric and genetic data of people.

5. GENERAL PRINCIPLES REGARDING THE PROCESSING OF PERSONAL DATA

Pursuant to Article 3 of the PDP Law, all kinds of operations performed on the data such as obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing use of personal data completely or partially automatically or by non-automatic means provided that it is a part of any data recording system is covered by the processing of personal data. It is mandatory to comply with the following principles in the processing of personal data:

- Compliance with the law and honesty rules: Our company carries out its personal data processing activities in accordance with the PDP Law, the relevant legislation and honesty rules, especially the Constitution.
- Being accurate and up-to-date when necessary: All kinds of administrative and technical measures to ensure the accuracy and timeliness of personal data are taken by our Company while the processing of personal data is being carried out.
- Processing for specific, clear and legitimate purposes: Our company clearly and precisely determines the purpose of processing personal data before starting the processing activity of personal data.
- Being limited and restrained in connection with the purposes for which they are processed: Personal data are processed by our Company for specific, clear and legitimate purposes as much as necessary in connection with the relevant purpose. Data processing activities are not carried out on the assumption that they can be used later.
- Retention for the period stipulated in the relevant legislation or necessary for the purpose for which they are processed: Our company stores personal data limited to the period stipulated in the PDP Law and the relevant legislation or required by the purposes related to the data processing activity.

6. PROCESSING OF PERSONAL DATA

Our company conducts processing activities of personal data and sensitive personal data in accordance with the data processing conditions regulated in Article 5 of the PDP Law respectively.

6.1. Conditions of Processing of Personal Data

Our company can process personal data with the explicit consent of the personal data owner or without explicit consent in the cases stipulated in article 5 of PDP Law and listed below:

- To be clearly stipulated in the laws.
- Being compulsory for the protection of the life or physical integrity of the person or another person, who is unable to express his/her consent due to actual impossibility or whose consent is not given legal validity.
- Being necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the establishment or performance of a contract. Being mandatory for our company to fulfill its legal obligations.
- The fact that the personal data has been made public by the owner himself.
- The fact that data processing is mandatory for the establishment, use or protection of a right.
- Being mandatory to process data for the legitimate interests of our Company, provided that it does not harm the fundamental rights and freedoms of the personal data owner.

6.2. Processing of Sensitive Personal Data

Our company performs the processing of sensitive personal data, which risks creating discrimination if they are processed illegally, in accordance with the data processing conditions set out in the article 6 of the PDP Law. It is prohibited to process sensitive personal data without the explicit consent of the personal data owner. However, personal data other than health and sexual life, in cases stipulated by law; personal data on health and sexual life can be processed without the explicit consent of the person concerned by persons or authorized institutions and organizations under the obligation to keep secrets only for protection of public health, preventive medicine, medical diagnosis, treatment and care services and for the planning and management of health services and its financing. The measures determined by the PDP Board for sensitive personal data processing activities are effectively implemented by our Company.

6.3. Classification of Personal Data

Categories of Personal Data Processed by Berko:

Identity Information: including but not limited to name-surname, Turkish Identity number, nationality information, parents' name, place of birth, date of birth, gender and social security number; all information contained in documents such as driver's license, identity card, residence.

Contact Information: Information such as phone number, address, e-mail, fax number.

Transaction Security: Information obtained and generated about the relevant person as a result of our commercial activities and the operations carried out by our business units within this framework. Personal data processed for the purpose of ensuring technical, administrative, legal and commercial security during the execution of commercial activities.

Risk Management Information: Personal data processed by means of methods used in accordance with generally accepted legal, commercial practices and honesty rules in these areas in order for us to manage our commercial, technical and administrative risks.

Financial Information: Personal data processed related to information, documents and records showing all kinds of financial results created according to the type of legal relationship established with the personal data owner.

Employee Candidate Information: Personal data processed related to individuals who have applied to become a Berko employee and have been evaluated as an employee candidate in accordance with the human resources needs of our company or who are in a working relationship with Berko.

Legal Action and Compliance Information: Personal data processed within the scope of the determination, tracking of our legal receivables and rights and the fulfillment of our debts.

Sensitive Personal Data: As stated in the article 6 of PDP Law; data related to race, ethnic origin, political thought, philosophical belief, religion, sect or other beliefs of persons,

appearance, membership for association, foundation or trade union, health, sex life, criminal convictions and security measures, as well as biometric and genetic data.

Marketing Information: The personal data processed for the marketing of our products and services by customizing them in accordance with the usage habits, likes and needs of the personal data owner and the reports and evaluations created as a result of the results of this processing.

Information on Customers Request/Complaint Management: Personal data related to the receipt and evaluation of any requests or complaints directed to Berko.

Building Security Information: Personal data related to recordings and documents taken at the entrance to the building, factory or facility, camera recordings, fingerprint recordings and recordings taken at the security point, data in which audio and visual recordings such as photos and audio are stored.

Location Information: Information, GPS location and other data that determine the location of the Person's location when using Berko vehicles by the relevant person within the framework of the commercial activities of Berko or group companies.

7. ENSURING THE SECURITY AND CONFIDENTIALITY OF PERSONAL DATA

Our company takes all necessary technical and administrative measures to ensure the legal processing and storage of the personal data it processes, to prevent unlawful access to such personal data in accordance with the article 12 of PDP Law. **The Head of the Personal Data Protection Unit, Legal Counsel, is authorized as the “Data Controller Representative” from the coordination within Berko** regarding the adequate and effective execution of the activities within the framework of the PDP Law as a whole within the framework of this policy. Within this scope, the Unit in question is authorized and responsible;

- For submitting this policy to the approval of the Board of Directors within the scope of following up and updating it when necessary,
- For establishing policies and procedures other than this policy regarding the protection, processing and destruction of personal data in coordination with the relevant Company units,
- For making the necessary distribution of tasks for the implementation of policies and procedures and submitting them to the approval of senior management,
- For monitoring and planning the audit of the implementation of all kinds of technical and administrative measures taken in accordance with the article 12 of Law,
- For following up the processes related to the applications and requests made by the personal data owners and providing the necessary coordination for the solution of the problems that may arise,
- For determining and monitoring the implementation of the issues that need to be done to ensure compliance with the PDP Law and related legislation,
- For conducting the relations with the Personal Data Protection Board.

7.1. Technical Measures Related to the Security of Personal Data.

All kinds of technical security measures have been taken for the protection of personal data and an adequate level of protection against possible risks has been provided. The main technical measures taken are listed below:

- Authorization and access controls are carried out periodically on the systems that provide access to personal data within our company.
- The technical measures taken are also monitored independently of the executive activities within the scope of risk management, internal control and internal audit processes.
- Personnel are employed at an adequate level of expertise.

7.2. Administrative Measures Related to Personal Data Security

- Employees of our company are trained and raised awareness about compliance with the PDP Law.

- In cases of personal data transfer, general conditions are established with the parties to whom the personal data are transferred, which include the obligations that must be fulfilled for the security of personal data in accordance with the PDP Law, and it is ensured that they are signed on the basis of the counterparty.

- Application rules are determined on the basis of business units in order to ensure the requirements determined for compliance with the PDP Law, and the administrative measures necessary to ensure their continuity are provided through internal procedures and trainings.

- Records that impose obligations not to process, disclose and use personal data are included in the contracts and documents governing the legal relationship between Berko and the counterparties, except for Berko's instructions and the exceptions imposed by Law, employee awareness is created on this issue and audits are carried out.

7.3. Precautions to be Taken in Case of Unauthorized Disclosure of Personal Data

If the personal data processed within the framework of the requirements for compliance with the PDP Law are obtained by others by illegal means, an internal procedure has been developed that ensures that this situation is notified to the relevant data owner and the PDP Board as soon as possible.

8. PURPOSES OF PROCESSING OF PERSONAL DATA AND STORAGE PERIODS

8.1. Purpose of Processing Personal Data

- Execution of the relevant processes within the scope of commercial contracts,
- Management of relations and business processes within the scope of contracts concluded with distributors and/or suppliers,
- Execution of processes related to employee candidates and establishment of employment contracts,
- Planning and execution of the audit activities necessary to ensure that the activities are carried out in accordance with the relevant legislation,
- Execution and follow-up of legal affairs and transactions,
- Execution of internal control processes,
- Being able to meet the demands of the relevant persons,
- Planning and execution of corporate sustainability activities,
- Evaluation of customer requests and complaints,
- Execution of the processes within the scope of marketing activities,
- Managing risk management processes,
- Being able to carry out the business activities of our company, our business relations and human resources processes,
- Realization of the processes arising from the corporate law,
- Ensuring that our products and services are presented to our customers in the most appropriate way,
- Providing information to authorized institutions and organizations in accordance with the obligations arising from the relevant legislation,
- Creation and tracking of visitor records for security purposes.

8.2. Duration of Storage of Personal Data

Our company determines whether a certain period is foreseen in the relevant legislation for the storage of personal data, in accordance with Article 138 of the Turkish Penal Code, Articles 4 and 7 of the Code of Obligations, Labor Law and PDP Law; ensures that the processed personal data is kept for the period required by the personal data processing purpose during this period or if a period is not stipulated in the relevant legislation only if there is a period stipulated in the relevant legislation.

9. DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

If the purpose of processing the personal data has expired and the relevant legislation and/or the storage periods determined by our Company have come to an end, the personal data are deleted, destroyed or anonymized by the data owner's request or by our Company ex officio. The procedures and principles related to this issue have been determined within the framework of the PDP Law and the provisions of the Regulation on the Deletion, Destruction or Anonymization of Personal Data.

9.1. Methods of Deletion And Destruction of Personal Data

It is essential that personal data be deleted and destroyed by methods appropriate to the recording environment. Details about the methods of deletion and destruction of personal data are included in the “Personal Data Storage and Destruction Policy”.

The possible deletion or destruction techniques used by Berko are listed below:

9.1.1. Physically Destruction

Personal data can also be processed by non-automatic means provided that it is part of any data recording system(document, file, CD, hard disk, etc.) . When deleting such data, a system of physical destruction of personal data is applied in such a way that it cannot be used later.

9.1.2. Secure Deletion from Software

When deleting data processed by fully or partially automatic means and stored in digital media, methods are used for deleting data from the relevant software in such a way that it can never be recovered by certain people or in any way.

9.2. Methods of Anonymization of Personal Data

Anonymization of personal data refers to the anonymization of Personal Data in such a way that it cannot be associated with other data to an identified or identifiable real person. In accordance with the article 28 of PDP LAW; anonymized personal data may be processed for purposes such as research, planning and statistics. Such processing is outside the scope of the PDP Law and the explicit consent of the personal data owner will not be sought. Since the personal data processed by being anonymized will be outside the scope of the PDP Law, rights set out in Section 12 of this Policy will not apply to this data. The anonymization techniques that are most likely to be used by Berko are listed below.

9.2.1. Data Masking

Masking is a method of anonymizing personal data by removing the basic determining information of personal data from the data set.

9.2.2. Data Aggregation

With the aggregation method, many data are aggregated and personal data are made to be unable to be associated with any person.

9.2.3. Data Derivation

With the data derivation method, a more general content is created than the content of the personal data and it is ensured that the personal data cannot be associated with any person.

9.2.4. Data Hashing

By data hashing method, the values in the personal data set with the data hash method, the decoupling of the connection between values and persons is ensured. The details about the anonymization techniques of personal data are included in the “Personal Data Storage and Destruction Policy”.

10. THIRD PARTIES TO WHOM PERSONAL DATA IS TRANSFERRED AND THE PURPOSES OF TRANSFER

Procedures and principles to be applied in personal data transfers are regulated in the articles 8 and 9 of the PDP Law. Personal data is processed in accordance with the provisions of the Law and other legislation in order to fulfill the services provided by our company, and can be shared for the purposes of planning human resources policies, Berko's group companies, infrastructure providers, third parties, distributors, for the realization of after-sales services, services and contracted institutions, real and legal persons with whom it has a proxy relationship, business partners, development of the services offered on the website, communicating with those who submit their requests and complaints to our company, ensuring legal, commercial and physical security. It is not possible to transfer personal data without the explicit consent of the personal data owner, except for the exceptions specified in the PDP Law.

10.1. Transfer of Personal Data Domestically

In accordance with Article 8 of the PDP Law, Domestic transfer of personal data is possible to our business partners, suppliers, group companies, companies and institutions we cooperate with, organizations operating in areas such as private security, health, occupational safety and law in order to fulfill our contractual or legal obligations provided that one of the conditions specified in section 6.1 of this Policy, titled "Personal Data Processing Conditions," is met.

10.2. Transfer of Personal Data Abroad

In accordance with the article 9 of PDP Law, if personal data is transferred abroad, in addition to the fact that the conditions for their domestic transfer have been met, the existence of one of the following issues is sought:

- Considering the country to be transferred among the countries with adequate protection declared by the PDP Board.
- If there is not sufficient protection in the country where the transfer will be made, the data controllers in Turkey and the relevant foreign country must commit to adequate protection in writing and have the permission of the PDP Board on this issue.

11. OBLIGATION TO PROVIDE INFORMATION

Our company informs the personal data owners during the collection of personal data in accordance with the article 10 of the PDP Law. In this context, our Company fulfills its obligation to inform by providing the following information to the personal data owners:

- The title of our company in the capacity of data controller
- For what purpose the personal data will be processed
- To whom and for what purposes the processed personal data may be transferred
- The method and legal reason of collecting personal data
- Rights of the personal data owner

12. THE RIGHTS OF PERSONAL DATA OWNERS AND THE EXERCISE OF THESE RIGHTS

In the event that personal data owners submit their requests regarding their rights listed under the title 12.1 of this section to Berko in accordance with Article 13 of the KVK Law, through the methods specified below or by other methods determined by the PDP Board, the said request is considered. Our company may request information from the relevant person in order to determine whether the person applying is a personal data owner or not, and may ask the personal data owner a question about his/her application in order to clarify the issues contained in the personal data owner's application.

12.1. Rights of the personal data owner

Personal data owners have the right to make requests from our Company regarding the following issues in accordance with Article 11 of the PDP Law:

- To learn whether his/her personal data is processed or not,
- To request information about it, if personal data has been processed,
- To learn the purpose of the processing of their personal data and whether their personal data are used in accordance with the purpose,

- To learn about the third parties to whom their personal data are transferred domestically or abroad,
- To request that their personal data be corrected in case of incomplete or incorrect processing and to request that the transaction made in this context be notified to the third parties to whom the personal data are transferred,
- To request the deletion, destruction or anonymization of their personal data if the reasons requiring the processing of their personal data disappear, and to request that the transaction made in this context be notified to the third parties to whom the personal data are transferred,
- To object to the occurrence of a result against the data owner by analyzing the processed data exclusively through automated systems,
- To request compensation for the damage if they suffer damage due to the unlawful processing of their personal data.

12.2. Cases Where They Cannot Assert Their Rights.

According to the article 28 of PDP Law, it is not possible for personal data owners to assert their application rights as the following situations are excluded from the scope of the PDP Law:

- Processing of personal data for purposes such as research, planning and statistics by anonymizing them with official statistics.
- Processing of personal data for art, history, literature or scientific purposes or within the scope of freedom of expression, provided that they do not violate national defense, national security, public security, public order, economic security, privacy of private life or personal rights or do not constitute a crime.
- In accordance with the paragraph 2 of Article 28 of PDP Law, except for the right to request compensation for the damage, it is not possible for the personal data owners to assert their rights in the following cases:
 - The fact that the processing of personal data is necessary for the prevention of the commission of a crime or for the investigation of a crime.
 - Processing of personal data made public by the data subject himself.

12.3. Way of Response

In accordance with the article 13 of PDP Law, our Company finalizes the application requests made by the personal data owner free of charge as soon as possible and no later than thirty days, depending on the nature of the request. However, if the transaction also requires a cost, it is possible to charge the fee in the tariff determined by the PDP Board. Our company may accept the application request of the personal data owner, as well as reject it for the reasons listed below, explaining its justification, and notify the relevant person of its response in writing or electronically.

- Preventing the rights and freedoms of other persons
- Requiring disproportionate effort
- The fact that the information is a public information
- Endangering the privacy of others
- Existence of one of the conditions that are excluded from the scope in accordance with the PDP Law

The personal data owner has the right to file a complaint with the PDP Board within thirty and in any case sixty days from the date of receipt of the data controller's response if his/her application is rejected, he/she finds the answer given insufficient or his/her application is not answered within the time limit.

13. THE PROCESSING OF PERSONAL DATA CARRIED OUT IN THE BUILDING, THE FACILITY AND DATA PROCESSING ACTIVITIES CARRIED OUT ON THE WEBSITE

13.1. Fingerprint Recognition And Monitoring With A Camera

Monitoring is carried out with a camera in the buildings where the Headquarters, Factory and Regional Offices of our company, and fingerprint recognition system is also used at some building entrances. There is no monitoring in areas that may lead to interference with a person's privacy. Only a limited number of Company employees and, if necessary, security company employees who are suppliers can access the collected data and security camera recordings. These persons who have access to the records declare that they will protect the confidentiality of the data they access with the confidentiality commitment they have signed.

13.2. Entrances and Exits of Those Who Visit the Company

Personal data processing activities are carried out for tracking the entry and exit of our guests who visit our company. The identity information of the persons coming to our company is processed only for the purpose of tracking their entry and exit, and the relevant personal data are recorded in the registration system physically and electronically.

13.3. Website Users

The internet movements of people visiting the website of our company within the site are recorded so that customized content can be shown to them and online advertising activities can be carried out (for example, cookies by technical means). Detailed explanations about these activities of our company are included in the texts of the Privacy Policies on our website.

14. BERKO PERSONAL DATA PROTECTION UNIT

Our company has established an internal structure to act in accordance with the regulations of the PDP Law and to ensure the enforcement of the Personal Data Protection and Processing Policy. In order to manage this Policy and other policies, procedures and instructions affiliated to and related to this Policy, the “Berko Personal Data Protection Unit” has been established within the Company under the Direction of Berko Legal Counsel. Within this framework, Berko İlaç has appointed Berko Legal Counsel as the Representative of the Personal Data Controller. The other members of the Unit, which consists of five people, are our Human Resources Manager, Information Processing Manager, Information Processing Chief and Human Resources Chief. The duties of the Personal Data Protection Unit are stated below:

- To ensure the establishment of basic policies, procedures and instructions related to the Protection and Processing of Personal Data and to put them into operation.
- To decide how the implementation and supervision of the policies related to the Protection and Processing of Personal Data will be carried out and to make internal assignments and to provide coordination within this framework.
- To determine the issues that need to be done to ensure compliance with the Law on the Protection of Personal Data and the relevant legislation; to oblige the relevant departments; to monitor its implementation and to ensure its coordination.

- To raise awareness about the Protection and Processing of Personal Data within the Company and before the institutions with which the Company cooperates.
- To ensure that the necessary measures are taken by identifying the risks that may arise in the Company's personal data processing activities; to submit improvement proposals to the approval of the senior management.
- To design and ensure the implementation of trainings on the protection of personal data and the implementation of policies, procedures and instructions.
- To decide on the applications of the personal data owners at the highest level.

- To coordinate the execution of information and training activities in order to ensure that the personal data owners are informed about their personal data processing activities and legal rights.
- To ensure that changes in the basic policies, procedures and instructions related to the Protection and Processing of Personal Data are prepared and put into effect.
- To follow the developments and regulations on the Protection of Personal Data; to advise the senior management on what should be done within the Company in accordance with these developments and regulations.
- To coordinate the relations with the Personal Data Protection Board and its Institution.
- To perform other duties to be assigned by the company management regarding the protection of personal data.

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