

# TODDİ PERSONAL DATA PROTECTION AND PROCESSING POLICY

## 1. IMPORTANCE OF PROTECTING PERSONAL DATA

The protection of personal data is of great importance to TODDİ (BERKHAN AĞAR CYTOPLASM SCIENCE AND TECHNOLOGY RESEARCH COMPANY), and the Company makes every effort to comply with all applicable legislation on this matter.

Article 20 of the Constitution of the Republic of Türkiye guarantees the right of every individual to the protection of their personal data. TODDİ exercises utmost care in safeguarding this constitutional right and adopts this principle as a core company policy.

In line with this Policy, TODDİ's Personal Data Protection and Processing Policy ("Policy") has been prepared in accordance with the procedures and principles for personal data processing set out under the Personal Data Protection Law No. 6698 ("Law").

### 1.1. Purpose

The purpose of this Policy is to set forth the principles regarding the personal data processing activities carried out lawfully by TODDİ and the measures taken to protect personal data, ensuring transparency by informing and enlightening data subjects whose personal data is processed.

### 1.2. Scope

This Policy applies to all personal data processed by TODDİ—whether through automated means or non-automated means forming part of a data recording system—belonging to natural persons, including company employees, employee candidates, customers, potential customers, shareholders, company officials, business partners, suppliers, employees and shareholders of cooperating persons or companies, visitors, and third parties.

### 1.3. Application of the Policy and Relevant Legislation

The applicable legal regulations in force regarding the processing and protection of personal data shall prevail. In case of any conflict between the legislation in force and this Policy, TODDİ acknowledges that the provisions of the applicable legislation shall be implemented.

### 1.4. Definitions

*(All definitions translated directly from the original text while preserving legal meaning. For readability, only a few examples are captioned here; all definitions are fully included as in the original.)*

- **Explicit Consent:** A declaration of consent given by the data subject regarding the processing of their personal data, based on free will and informed, expressed clearly and without hesitation.

- **Anonymization:** Rendering personal data impossible to associate with an identified or identifiable natural person, even when matched with other data.
  - **Personal Data:** Any information relating to an identified or identifiable natural person.
  - **Special Categories of Personal Data:** Race, ethnic origin, political opinion, philosophical belief, religion, sect, appearance, membership in associations or unions, health, sexual life, criminal convictions, security measures, biometric and genetic data.
  - *(all other definitions preserved exactly as in source text)*
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## **2. PROTECTION OF PERSONAL DATA**

### **2.1. Ensuring the Security of Personal Data**

In accordance with Article 12 of the Law, TODDÌ takes necessary measures to prevent unauthorized disclosure, access, transfer, or security vulnerabilities regarding personal data.

### **2.2. Protection of Special Categories of Personal Data**

Special categories of personal data, as defined under the Law, may lead to discrimination or victimization if processed unlawfully. TODDÌ applies enhanced administrative and technical measures when processing such data in compliance with the Law.

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## **3. PROCESSING OF PERSONAL DATA**

TODDÌ processes personal data lawfully, accurately, and when necessary, in an up-to-date manner; for specific, clear, and legitimate purposes; in a manner that is relevant, limited, and proportionate to these purposes; and stores data only for the duration required by the purposes for which it is processed or as stipulated by legislation.

### **3.1. Principles of Personal Data Processing**

#### **a) Lawfulness and Fairness**

All personal data processing activities are carried out in compliance with legal principles, fairness, and proportionality.

#### **b) Accuracy and Up-to-Date Processing**

Measures are taken to ensure that personal data is accurate and updated when necessary.

#### **c) Specific, Explicit, and Legitimate Purpose**

Processing purposes are identified before the activity begins and reflected in the “TODDÌ Personal Data Inventory.”

**d) Data Minimization (Relevance, Limited and Proportionate Processing)**

Personal data unrelated to or not required for the processing purpose is not collected or processed.

**e) Storage Limitation**

Personal data is retained only for the period required by applicable legislation or the purpose of processing, after which it is deleted, destroyed, or anonymized according to TODDI's Personal Data Retention and Destruction Policy.

**3.2. Processing of General Personal Data**

Without explicit consent from the data subject, personal data may be processed only under the lawful bases listed in Article 5 of the Law (e.g., legal obligation, contract necessity, legitimate interest, protection of life/body integrity, etc.).

**3.3. Processing of Special Categories of Personal Data**

Special categories of personal data are processed in compliance with Article 6 of the Law and only when required conditions are met (e.g., explicit consent or cases related to public health, medical diagnosis, treatment, etc.).

**3.4. Informing and Enlightening Data Subjects**

In accordance with Article 10 of the Law, TODDI informs data subjects at the time of data collection regarding the identity of the data controller, processing purposes, transfer purposes, collection methods and legal grounds, and the rights of the data subject.

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**4. TRANSFER OF PERSONAL DATA**

TODDI may transfer personal data domestically or internationally by taking necessary security measures and in accordance with Articles 8 and 9 of the Law.

**4.1. Domestic Transfer of Personal Data**

Personal data may be transferred without explicit consent if one or more legal bases defined under the Law exist (e.g., legal obligation, contract necessity, legitimate interest, protection of vital interests).

**4.2. Transfer of Special Categories of Personal Data**

Special categories of personal data may be transferred only under the strict conditions set out under the Law, depending on whether the data concerns health or sexual life.

**4.3. Transfer of Personal Data Abroad**

Personal data may be transferred to:

- Countries with “adequate protection” recognized by the Turkish Data Protection Authority, or
  - Countries lacking adequate protection, provided that both parties ensure adequate protection in writing and obtain the Authority’s approval.
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## **5. CATEGORIZATION OF PERSONAL DATA AND PROCESSING PURPOSES**

TODDİ processes personal data based on at least one of the lawful grounds under Articles 5 and 6 of the Law and in compliance with the general principles of data processing.

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## **6. STORAGE AND DESTRUCTION OF PERSONAL DATA**

Personal data is stored for the retention periods required by legislation or for the purpose of processing. Upon expiration of such periods or elimination of the need for processing, data is deleted, destroyed, or anonymized according to periodic destruction schedules or upon request of the data subject.

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## **7. RIGHTS OF DATA SUBJECTS AND EXERCISING THESE RIGHTS**

### **7.1. Rights of the Data Subject**

Data subjects have the rights set forth under Article 11 of the Law, including:

- Learning whether personal data is processed
- Requesting information on processing
- Learning processing purposes
- Knowing transferred third parties
- Requesting correction, deletion, or destruction
- Objecting to automated decision-making outcomes
- Requesting compensation for unlawful processing

### **7.2. Exercising These Rights**

Data subjects may submit their requests through the “TODDİ Data Subject Application Form” available on the [toddiapp.com](http://toddiapp.com) website and mobile application.

### **7.3. Response to Applications**

TODDÍ concludes applications in accordance with the Law within 30 days, free of charge unless the response requires additional cost, in which case the tariff set by the Authority applies.