



VİSTA KUYUMCULUK SAN. VE TİC. LTD. ŞTİ. PERSONAL DATA PROTECTION POLICY

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The Vista Kuyumculuk Personal Data Protection Policy ("Policy"), a fundamental component of the Vista Kuyumculuk Code of Ethics, is designed to establish a compliance framework for Vista Kuyumculuk entities in adhering to legislation concerning the protection and processing of personal data. This Policy ensures that the processing of personal data by Vista Kuyumculuk is conducted in accordance with principles of lawfulness, fairness, and transparency. All employees and executives are mandated to comply with this Policy, and Business Partners are expected to adhere to its principles where applicable.

Definitions

- **"Explicit Consent"**: Informed consent given freely and specific to the context.
- **"Anonymization"**: The process of altering personal data such that the data subject is no longer identifiable.
- **"Data Subject"**: Any individual whose personal data is being processed.
- **"Business Partners"**: Includes suppliers, vendors, authorized service providers, representatives, subcontractors, and consultants acting on behalf of the company.
- **"Personal Data"**: Any information relating to an identified or identifiable natural person.
- **"Processing of Personal Data"**: Any operation performed on personal data, such as collecting, storing, updating, or deleting.
- **"Vista Kuyumculuk"**: Refers to all entities under the direct control of Vista Kuyumculuk.
- **"Legislation"**: All applicable laws regarding personal data protection, especially the Law No. 6698 on the Protection of Personal Data.
- **"Special Categories of Personal Data"**: Data pertaining to racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual life, and other sensitive matters.
- **"VERBİS"**: Data Controllers Registry Information System.
- **"Data Processor"**: An entity that processes data on behalf of the data controller.
- **"Data Controller"**: The entity that determines the purposes and means of processing personal data.

General Principles

Violations of this Policy can result in severe consequences, including legal, administrative, or criminal penalties, as well as damage to Vista Kuyumculuk's reputation. Compliance with the legislation and principles of personal data processing is paramount.

Application of The Policy

Vista Kuyumculuk rigorously implements its Personal Data Protection Policy across all operational facets to ensure adherence to prevailing personal data protection legislation. The structured approach and essential steps Vista Kuyumculuk undertakes to align its activities with the defined policy directives are:

1. **Personal Data Processing Conditions Compliance**: Vista Kuyumculuk engages in the processing of personal data strictly based on the conditions outlined in applicable legislation. Before any data processing activity begins, Vista Kuyumculuk ensures that it is grounded on one of the legally defined conditions, securing legitimacy and adherence to legal prerequisites.
2. **Special Categories of Personal Data Handling**: Special attention is paid to the processing of sensitive personal data, in line with the stringent conditions stipulated by legislation. Vista Kuyumculuk adopts all necessary technical and administrative measures to protect these data categories, ensuring that processing activities meet legal benchmarks and that explicit consent requirements, particularly concerning health and sexual life data, are rigorously observed unless otherwise stipulated by law.
3. **Data Transfer Protocols**: In transferring personal data to third parties, Vista Kuyumculuk maintains strict adherence to the purposes of data processing and the legal bases, alongside implementing necessary security measures. The company ensures that its processes are in harmony with legislative conditions for data transfer, safeguarding the rights of data subjects.



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4. **Personal Data Protection and Processing Obligations:** Fulfilling obligations related to personal data protection involves several key activities, including:
- **VERBİS Registration:** Vista Kuyumculuk ensures registration with VERBİS as mandated by legislation, keeping the registry information timely updated in response to any changes.
 - **Periodic Review and Reporting:** The company commits to a semi-annual review of its VERBİS registrations and any updates, reporting the findings to the designated legal and compliance departments to ensure continuous compliance.

Vista Kuyumculuk's commitment to the meticulous application of its Personal Data Protection Policy underscores its dedication to safeguarding personal data integrity and adhering to legal standards. This policy application framework is instrumental in guiding Vista Kuyumculuk's operations towards ethical and lawful data handling practices, reflecting the company's core values of responsibility, transparency, and respect for individual privacy.

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APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

Vista Kuyumculuk San. ve Tic. Ltd. Şti.

PREPARED AND APPROVED BY VİSTA KUYUMCULUK BOARD OF DIRECTORS