

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	1/20

LPPD COMPLIANCE POLICY



1.0 PURPOSE

The purpose of this Policy is to protect the fundamental rights and freedoms of individuals whose personal data are processed, particularly their right to privacy, in the processing of personal data obtained within Naturel Holding and its subsidiaries, and to ensure transparency in all activities carried out by our Company through public disclosure and information.

2.0 SCOPE

The scope of this Policy covers all personal data of individuals whose personal data are processed by us, whether directly or indirectly.

3.0 PRINCIPLES

In the event of any inconsistency between the applicable legislation and this Policy, the applicable legislation shall prevail. Where another policy or regulation has been established on the same subject for more specific purposes beyond the scope of this general Policy, the provisions containing the specific requirements shall take precedence.

Any provisions of other policies or documents that conflict with this Policy and the applicable legislation shall not apply.

3.1 MATTERS RELATING TO THE PROCESSING OF PERSONAL DATA

The general principles applicable to the processing of personal data are set out under the following headings.

Compliance with the Law and the Principle of Good Faith:

When processing individuals' personal data, such data shall be obtained and processed in accordance with applicable laws and the principles of good faith throughout the processing activities. Naturel Holding and its subsidiaries exercise the utmost care to ensure compliance with applicable laws and the principles of good faith when processing personal data.

Being Accurate and, Where Necessary, Up-to-Date:

The personal data processed must always be accurate and, where necessary, up-to-date. Naturel Holding and its subsidiaries verify the accuracy of the processed data at each stage of processing and plan and implement the necessary activities to ensure that such data are kept up-to-date where required.

Processing for Specific, Explicit and Legitimate Purposes:

During the processing of personal data, the categories of data to be processed shall be clearly identified. The scope of the data to be processed and the purposes for which such data are processed shall be clear, lawful and legitimate. Naturel Holding and its subsidiaries process personal data only for legitimate purposes and take due care to ensure that the data to be obtained during such processing are clearly identified.

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	2/20

LPPD COMPLIANCE POLICY



To prevent the information and data obtained from being used for different purposes or causing misunderstanding, Naturel Holding and its subsidiaries process personal data in a clear and unambiguous manner.

Being Relevant, Limited and Proportionate to the Purpose for Which They Are Processed:

Personal data shall be processed in accordance with, and limited to, the purpose for which they are processed, and in a relevant, proportionate and controlled manner. When processing personal data, Naturel Holding and its subsidiaries process the personal data of data subjects only to the extent that is relevant to and limited to the purpose of processing and in a proportionate manner.

Retention for the Period Stipulated by the Applicable Legislation or Necessary for the Purpose for Which They Are Processed:

Personal data processed shall be retained for no longer than the period stipulated under the applicable legislation or the period necessary for the purpose for which the data are processed, with the aim of ensuring the highest level of protection.

In this context, where the applicable legislation stipulates a specific retention period for personal data, Naturel Holding and its subsidiaries retain such personal data only for the period prescribed by the applicable legislation.

Where no retention period is prescribed by applicable legislation, or where there is no legal basis requiring the data to be retained for a longer period, personal data shall be retained only for the period necessary for the purposes for which they are processed. In this way, the security of data subjects is ensured at the highest possible level.

3.2 CONDITIONS FOR THE PROCESSING OF PERSONAL DATA

Naturel Holding and its subsidiaries process the personal data of data subjects in a lawful and compliant manner, in accordance with the requirements of the applicable legislation set out below.

Conditions for the Processing of General Personal Data:

Concept of General Personal Data:

All types of personal data processed by Naturel Holding and its subsidiaries that do not fall within the categories of special categories of personal data specified in this section constitute the category of general personal data.

General Rule:

Personal data may not be processed without the explicit consent of the data subject.

Exceptions:

Where one of the following conditions is met, personal data may be processed without obtaining the explicit consent of the data subject:

- Where processing is expressly provided for by law.

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	3/20

LPPD COMPLIANCE POLICY



- Where processing is necessary to protect the life or physical integrity of the data subject or another person who is unable to give consent due to actual impossibility or whose consent is not legally recognized as valid.
- Where processing is necessary for the establishment or performance of a contract, provided that such processing is directly related to the parties to the contract.
- Where processing is necessary for the data controller to fulfill its legal obligations.
- Where the personal data have been made public by the data subject themselves.
- Where processing is necessary for the establishment, exercise or protection of a right.
- Where processing is necessary for the legitimate interests of the data controller, provided that such processing does not adversely affect the fundamental rights and freedoms of the data subject.

Conditions for the Processing of Special Categories of Personal Data:

Concept of Special Categories of Personal Data:

Personal data relating to an individual's race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and clothing, membership of an association, foundation or trade union, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data, constitute special categories of personal data.

General Rule:

The processing of special categories of personal data is prohibited.

Exceptions and Special Circumstances:

The processing of special categories of personal data shall only be permitted where:

- The explicit consent of the data subject has been obtained;
- Processing is expressly provided for by law;
- Processing is necessary to protect the life or physical integrity of the data subject or another person who is unable to give consent due to actual impossibility or whose consent is not legally recognized as valid;
- The personal data have been made public by the data subject and the processing is consistent with the data subject's intention to make such data public;
- Processing is necessary for the establishment, exercise or protection of a right;
- Processing is necessary for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning, management and financing of healthcare services, by persons or authorized institutions and organizations that are subject to an obligation of confidentiality;
- Processing is necessary for the fulfillment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance;

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	4/20

LPPD COMPLIANCE POLICY



- Processing is carried out by foundations, associations and other non-profit organizations or entities established for political, philosophical, religious or trade union purposes, provided that the processing is in accordance with the legislation to which they are subject and their purposes, is limited to their fields of activity, and is not disclosed to third parties, and is related to their existing or former members or persons who have regular contact with such organizations or entities.

Data Protection Board Requirements:

In the processing of special categories of personal data, it is also mandatory to take adequate measures determined by the Personal Data Protection Board.

3.3 PROTECTION OF PERSONAL DATA

Security of Personal Data:

In accordance with Article 12 of the Personal Data Protection Law (Law No. 6698), Naturel Holding and its subsidiaries take all necessary technical and administrative measures, taking into account technological capabilities and implementation costs, to ensure that personal data are processed in compliance with the law.

Personal data learned or obtained by data controllers and data processors in the course of their duties may not be disclosed to third parties in violation of the provisions of the Law or used for purposes other than those for which they are processed.

Necessary training has been provided to Holding and subsidiary personnel on technical matters, awareness has been raised among employees regarding personal data protection, and relevant audits are conducted. The relevant departments of the Holding work in coordination with the Legal Department, thereby ensuring the employment of personnel with the necessary knowledge and expertise within the Holding.

Measures Taken to Ensure the Lawful Processing of Personal Data:

Naturel Holding and its subsidiaries take technical and administrative measures to ensure that personal data are processed in compliance with applicable laws.

Personal data processing activities carried out within Naturel Holding and its subsidiaries are monitored through technical systems and reported to the relevant persons.

The personal data processing activities carried out by business units within the Holding, as well as the requirements to be fulfilled to ensure that such activities comply with the conditions for the processing of personal data stipulated under Law No. 6698, are determined separately for each business unit and according to the specific activities carried out by the relevant unit.

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	5/20

LPPD COMPLIANCE POLICY



The measures required to ensure compliance with applicable laws and to ensure the continued implementation and oversight of the procedures prepared for the relevant units are implemented through administrative measures, internal Holding policies and training.

Measures Taken to Prevent Unlawful Access:

Naturel Holding and its subsidiaries take technical and administrative measures, depending on the nature of the data to be protected, to prevent the negligent or unauthorized disclosure, access, transfer or any other form of unlawful access to personal data.

The principal technical and administrative measures taken within the Holding to prevent unlawful access to personal data are as follows:

- Technical measures implemented through access control and authorization solutions are periodically reported. Matters posing risks are reassessed and the necessary technological solutions are developed accordingly. Software and hardware, including logging systems, antivirus protection systems and firewalls, are installed and maintained.
- Personnel with the necessary technical knowledge and expertise are employed.
- Access to and authorization for personal data within the Holding are designed and implemented in accordance with legal compliance requirements specific to each business unit.
- Employees are informed that they may not disclose the personal data they have learned or obtained in the course of their duties to third parties in violation of the Personal Data Protection Law and other applicable legislation, or use such data for purposes other than those for which they are processed. Employees are also informed that this obligation continues after termination of their employment, and the necessary undertakings are obtained from them accordingly.
- Provisions requiring the recipients of personal data to take the necessary security measures for the protection of personal data are included in the agreements entered into by Naturel Holding and its subsidiaries with persons or entities to whom personal data are lawfully transferred, and/or mutual agreements or undertakings are executed.

Measures Taken to Ensure the Secure Storage of Personal Data:

Naturel Holding and its subsidiaries take the necessary technical and administrative measures to ensure that personal data are stored in secure environments and to prevent their unlawful destruction, loss or alteration.

The principal technical and administrative measures taken within the Holding to ensure the secure storage of personal data are as follows:

- Systems that are compatible with technological developments are used to ensure the secure storage of personal data.
- Personnel with the necessary technical expertise are employed.

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	6/20

LPPD COMPLIANCE POLICY



- Technical security systems are established for storage areas. The technical measures implemented are reported to the relevant parties, and matters posing risks are reassessed and the necessary technological solutions are developed accordingly.
- Backup programs are used in compliance with applicable laws to ensure the secure storage of personal data.
- Non-digital personal data are kept in locked cabinets and may only be accessed by authorized persons.

3.4 AUDIT

Pursuant to paragraph 3 of Article 12 of the Personal Data Protection Law, the data controller is required to conduct or have conducted the necessary audits within its own organization or institution in order to ensure the implementation of the provisions of the Law.

Audit of Measures Taken for the Protection of Personal Data:

The Internal Audit, Quality, Human Resources and Legal Departments within Naturel Holding conduct and/or commission the necessary audits to ensure the establishment of data security described above within the Holding and to ensure the regularity and continuity of the measures taken.

The results of these audits are reported to the relevant departments and management within the Holding as part of its internal operations. The necessary activities to improve the measures taken are carried out in accordance with the Personal Data Protection Law, other applicable legislation and this Policy.

Audit of Awareness-Raising Activities within Business Units Regarding the Protection and Processing of Personal Data:

Naturel Holding and its subsidiaries provide the business units with the necessary training, seminars and sessions to increase awareness of the lawful processing of personal data, prevent unlawful access to personal data and ensure the protection of such data.

Training programs are updated and renewed in parallel with amendments and updates to the applicable legislation. The necessary systems are established to raise awareness regarding the protection of personal data, and audits on this matter are conducted in coordination with the Legal Department.

The results of training activities aimed at increasing awareness regarding the protection and processing of personal data are reported by the Human Resources Department. Participation in such training programs is mandatory for employees of Naturel Holding and its subsidiaries and is monitored accordingly.

3.5 CONFIDENTIALITY

Naturel Holding and its subsidiaries take all necessary measures, to the extent reasonably practicable and depending on the nature of the personal data to be protected, to prevent the disclosure or transfer of personal data in violation of applicable laws and the provisions of this Policy, unauthorized access to such data, and any other incidents or activities that may arise from security deficiencies.

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	7/20

LPPD COMPLIANCE POLICY



Necessary training has been provided to the personnel of Naturel Holding and its subsidiaries on these matters, and personnel with the relevant knowledge and expertise have been employed.

Personal data processing activities carried out by Naturel Holding are reviewed and audited in detail and periodically. Where technologically feasible, the necessary measures are implemented in relation to the processing of personal data, and such measures are regularly updated and improved as necessary.

The Internal Audit, Human Resources, Quality and Legal Departments work in coordination in the implementation and oversight of these activities within the Holding.

3.6 UNAUTHORIZED DISCLOSURE OF PERSONAL DATA

With respect to offenses involving the unauthorized disclosure of personal data, Articles 135 to 140 of the Turkish Criminal Code No. 5237 and all other applicable legislation shall apply. The provisions of all applicable legislation are communicated by the Holding to its employees and relevant persons.

Natural persons who unlawfully record personal data; unlawfully provide, disclose, disseminate or obtain personal data belonging to another person; fail to destroy personal data stored in a system after the expiry of the periods prescribed by law; or, in violation of Article 7 of the Personal Data Protection Law, fail to delete or anonymize personal data despite the disappearance of the reasons that justified their storage or processing, shall be subject to imprisonment pursuant to Article 138 of the Turkish Criminal Code.

The procedures and principles governing the deletion, destruction or anonymization of personal data are regulated by secondary legislation.

Pursuant to the provisions of the Turkish Criminal Code, a person who unlawfully provides personal data to another person, unlawfully disseminates or obtains such data shall be sentenced to imprisonment for a term of two to four years. Where the offense is committed by taking advantage of the opportunities provided by a particular profession or occupation, the offender shall be subject to the aggravated form of the applicable penalty.

Where an employee of the Holding, without authorization to process personal data, accesses, obtains or unlawfully gains access to personal data, including through hacking, the incident shall be reported without delay to the relevant data subject, the public prosecutor and the competent authorities. Necessary action shall be taken against the employee, and the employee shall be subject to the applicable aggravated penalties where the conditions for such penalties are met.

In accordance with the provisions of the Personal Data Protection Law under the heading of Administrative Offenses, administrative fines may also be imposed on those who fail to fulfill their obligation to inform data subjects or their obligations concerning data security, fail to comply with decisions issued by the Personal Data

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	8/20

LPPD COMPLIANCE POLICY



Protection Board, or act in violation of their obligations to register with and notify the Data Controllers Registry.

3.7 ORGANIZATIONAL MEASURES FOR THE PROTECTION OF COMPANY PERSONAL DATA

Naturel Holding and its subsidiaries establish an organizational structure to ensure the effective implementation of the KVKK Compliance Policy.

A committee has been established within Naturel Holding to manage this Policy and other policies related to and associated with this Policy. The duties and responsibilities of the Committee are set out below. In addition to these duties, the Committee shall also perform other tasks assigned by senior management. The Committee shall carry out all of its activities with the approval of senior management.

- To prepare the fundamental policies concerning the protection and processing of personal data and, where necessary, amendments to such policies;
- To determine how the policies concerning the protection and processing of personal data shall be implemented and how the monitoring of their implementation shall be carried out;
- To make internal assignments and ensure coordination within the Company;
- To identify the actions and measures required to ensure compliance with the Personal Data Protection Law and other applicable legislation and to ensure the implementation of such measures;
- To raise awareness within the Company and among institutions and organizations with which the Company cooperates regarding the protection and processing of personal data, and to organize training programs in this context;
- To identify potential risks arising from the Company's personal data processing activities and ensure that the necessary measures are taken;
- To make decisions at the highest level regarding applications submitted by data subjects;
- To monitor developments and regulatory changes concerning the protection of personal data and take the necessary actions.

The Contact Person is the natural person notified by Naturel Holding and its subsidiaries to the relevant registry at the time of registration for the purpose of establishing communication with the Authority. The notified natural person or persons are members of the units within our Company that have been assigned responsibility for these matters.

In accordance with the Regulation on the Data Controllers Registry, Naturel Holding and its subsidiaries have limited the function of the Contact Person to acting as a point of contact and ensuring that requests submitted by data subjects to the data controller are answered promptly and effectively.

Through this arrangement, the Company aims to respond to the questions and concerns of data subjects whose personal data are processed in the fastest and most informative manner possible. However, the Contact Person is not legally authorized to represent the data controller.

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	9/20

LPPD COMPLIANCE POLICY



Accordingly, the Contact Person has no authority or responsibility beyond providing information, responding lawfully to questions raised by the data subject or other relevant person in communication with the Holding or the Contact Person, and informing the Holding of such matters.

Upon being informed by the Contact Person of Naturel Holding and its subsidiaries, the authorized department or entity designated by the Holding shall promptly take the necessary actions regarding the matter and implement the applicable procedures.

During these processes, the data subject or relevant person shall be informed about the actions and procedures carried out, and, where necessary, the authorized department or entity of the Holding shall conduct the relevant communications with the data subject or other relevant persons.

3.8 THIRD PARTIES TO WHOM PERSONAL DATA ARE TRANSFERRED AND THE PURPOSES OF SUCH TRANSFERS

In accordance with Article 10 of the Personal Data Protection Law, our Company informs data subjects of the categories of persons or entities to whom their personal data are transferred.

In accordance with Articles 8 and 9 of the Personal Data Protection Law, Naturel Holding and its subsidiaries may transfer the personal data of data subjects covered by this Policy to the following categories of recipients:

- Business partners;
- Suppliers;
- Group Companies;
- Shareholders;
- Authorized representatives and officials;
- Legally authorized public institutions and organizations;
- Legally authorized private-law legal entities.

4.0 DELETION OF PERSONAL DATA, RETENTION PERIODS AND DATA INVENTORY

4.1 OBLIGATIONS OF NATUREL HOLDING AND ITS SUBSIDIARIES

In accordance with Article 7 of the Personal Data Protection Law No. 6698 and Article 138 of the Turkish Criminal Code No. 5237, Naturel Holding shall delete, destroy or anonymize personal data that have been processed and for which the purposes of processing and retention have subsequently ceased to exist.

Such deletion, destruction or anonymization shall be carried out in accordance with a decision to be taken by the Holding, taking into consideration the rights arising from the Turkish Commercial Code, the rights granted under all applicable legislation and the principles set forth in this Policy, or upon the explicit request of the data subject, provided that such request does not adversely affect the legitimate interests of the Holding in its commercial activities, in accordance with Article 7 of the Personal Data Protection Law.

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	10/20

LPPD COMPLIANCE POLICY



4.2 DELETION, DESTRUCTION OR ANONYMIZATION OF PERSONAL DATA

Deletion and Destruction of Personal Data:

The deletion of personal data is defined in Article 8 of the Regulation as “the process of making personal data inaccessible and unusable in any way for the relevant users.”

The destruction of personal data is defined in Article 9 of the Regulation as “the process of making personal data inaccessible, irretrievable and unusable in any way by anyone.”

Methods for the Deletion of Personal Data

Software as a Service (SaaS) Cloud Solutions (Office 365, Salesforce, etc.):

Data stored in cloud systems are deleted by issuing a deletion command. During this process, the relevant user is not authorized to recover the deleted data within the cloud system.

Personal Data in Paper-Based Records:

Personal data contained in paper-based records are deleted using the redaction method. Redaction is carried out by physically cutting out the personal data on the relevant document where possible. Where physical removal is not possible, the personal data are rendered invisible to the relevant users using permanent ink in a manner that cannot be reversed or made readable through technological solutions.

Office Files Stored on a Central Server:

Deletion is carried out by using the deletion command of the operating system or by revoking the relevant user's access rights to the file or to the directory in which the file is stored.

Personal Data Stored on Portable Media:

Personal data stored on flash-based storage media are kept in encrypted form and deleted using software appropriate for the relevant storage media.

Databases:

The relevant rows containing personal data are deleted using database commands. The person performing this operation is not the database administrator.

Methods for the Destruction of Personal Data

Physical Destruction:

Personal data may also be processed through non-automated means, provided that they form part of any data recording system. When such data are destroyed, they shall be physically destroyed in a manner that prevents them from being used again.

De-magnetization:

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	11/20

LPPD COMPLIANCE POLICY



De-magnetization is the process of rendering data stored on magnetic media unintelligible and unreadable by passing the media through a specialized device and exposing it to a high-intensity magnetic field.

Paper-Based Records:

Personal data contained in paper-based records are destroyed by using paper shredders and destruction machines to reduce the documents to a size and form that makes the information unintelligible.

Anonymization of Personal Data

The anonymization of personal data is defined in Article 10 of the Regulation as “the process of rendering personal data incapable of being associated, in any way, with an identified or identifiable natural person, even when matched with other data.”

Methods for the Anonymization of Personal Data

Masking Method:

This is an anonymization method whereby distinctive attributes or characteristics of data subjects whose personal data are being processed are removed or deleted.

Example: Preventing the identification of the data subject by removing information such as the Turkish Republic Identification Number (T.R. ID Number) or other information that enables the data subject to be identified.

Data Shuffling / Permutation Method:

This method aims to anonymize personal data by changing the positions of certain information relating to data subjects whose data are stored within the system.

Example: Preventing the identification of a data subject by changing the values of certain sub-categories of employee information while retaining the main categories of such information.

Data Derivation Method:

This method involves making additions to or subtractions from certain variables contained in the data within the system to ensure that the information becomes impossible to determine or identify.

Example: Instead of providing the detailed residential address of a data subject whose personal data are being processed, specifying only the neighborhood or district in which the person resides.

Aggregation Method:

This is a method of converting specific personal data into a more general value. Through this method, data are generalized so that the personal data can no longer be associated with any particular individual.

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	12/20

LPPD COMPLIANCE POLICY



Example: Instead of listing the neighborhoods in which employees reside individually, stating that a certain number of employees reside in Neighborhood X.

Procedure for Selecting the Anonymization Method by Naturel Holding and Its Subsidiaries:

One or more of the anonymization methods described above shall be selected by the Committee established by Naturel Holding to ensure the effective implementation of this Policy, taking into consideration all applicable legislation and the legitimate interests of Naturel Holding and its subsidiaries in the course of their business activities.

The anonymization method to be selected shall be determined by the Committee by taking into consideration the following factors:

- The nature of the data;
- The volume of the data;
- The manner in which the data are stored in physical environments;
- The diversity of the data;
- The purpose for which the data are processed.

The anonymization process shall be carried out in accordance with the principles set forth in the sections of this Policy concerning retention periods and the personal data inventory.

4.3 RETENTION PERIODS

Naturel Holding and its subsidiaries retain personal data in their data inventories in accordance with the retention periods prescribed under all applicable legislation.

Where no specific retention period is prescribed under the applicable legislation, Naturel Holding and its subsidiaries retain personal data for periods determined in accordance with the practices and customary practices of the relevant sector, provided that such periods comply with applicable laws and regulations and are consistent with the legitimate interests of the Holding.

Where the retention of personal data is no longer necessary, such data shall be deleted, destroyed or anonymized using the methods described above.

Personal data may also be retained for the purpose of using such data in any legal disputes that may arise in the future where the purpose of processing and retention has ceased to exist and the retention periods prescribed under all applicable legislation concerning personal data and the principles established by the Holding under this Policy have expired.

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	13/20

LPPD COMPLIANCE POLICY



Personal data retained under this provision shall be used solely for the purposes of legal disputes and shall not be used for any other purpose. In accordance with the principles set forth above, Naturel Holding takes all reasonably foreseeable measures and precautions in this regard.

For example, in a potential legal action brought by an employee who has left the workplace in connection with the unlawful termination of their employment contract, the use of information contained in the data system to determine the employee's place of residence for the purpose of determining the competent court may be considered within this scope. The scope of the foregoing is not limited to the example provided.

4.4 PERSONAL DATA INVENTORY

The Personal Data Inventory refers to the data maintained separately by each unit within Naturel Holding and its subsidiaries in accordance with the Personal Data Protection Law (KVKK) and the Regulation on the Data Controllers Registry. It includes data demonstrating that the deletion, destruction and anonymization of personal data are carried out in compliance with applicable legislation and the Holding's Policy, as described above, and which may be submitted to the Personal Data Protection Authority, where required, in formats such as Word, Excel, etc.

According to the definition set forth in the Regulation, a Personal Data Inventory shall contain at least the following:

- Purposes of personal data processing;
- Data categories;
- Maximum retention periods required for the processing of personal data, determined by associating the categories of recipients to whom personal data are transferred with the categories of data subjects;
- Categories of personal data anticipated to be transferred to foreign countries;
- Measures taken to ensure data security.

Taking the above criteria into consideration, information concerning the processing activities to be carried out in relation to personal data is collected and maintained in the relevant inventory.

The contents of the Inventory may be stored by the Holding in digital environments, such as Word or Excel, in accordance with applicable laws and regulations and the Holding's legitimate interests. Where certain information cannot be maintained in digital environments, such information may also be retained in paper-based records.

The deletion, destruction and anonymization of personal data shall be recorded in the Personal Data Inventory by Naturel Holding or by an authorized person designated by the Holding.

Preparation of the Personal Data Inventory:

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	14/20

LPPD COMPLIANCE POLICY



Where the applicable legislation contains provisions governing the preparation of the Personal Data Inventory, Naturel Holding shall prepare the Personal Data Inventory in accordance with such provisions.

Where the applicable legislation does not prescribe a specific procedure for the preparation of the Personal Data Inventory, the Holding shall have discretion to determine the appropriate procedure for preparing the Personal Data Inventory, taking into consideration its internal working practices and business processes.

5.0 RIGHTS OF DATA SUBJECTS AND RULES REGARDING THE EXERCISE OF SUCH RIGHTS

5.1 RIGHTS OF DATA SUBJECTS

Naturel Holding and its subsidiaries maintain the necessary channels, internal processes, administrative and technical arrangements in accordance with Article 13 of the Personal Data Protection Law to evaluate requests from data subjects concerning their rights and to provide data subjects with the necessary information.

Where data subjects submit their requests concerning the rights listed below to the Holding in writing, Naturel Holding and its subsidiaries shall conclude the request free of charge within thirty days at the latest, depending on the nature of the request. However, where a fee is prescribed by the Personal Data Protection Board, the Holding shall charge the applicant the fee specified in the tariff determined by the Personal Data Protection Board.

Data subjects have the right to:

- Learn whether their personal data have been processed;
- Request information if their personal data have been processed;
- Learn the purpose of processing their personal data and whether such data are used in accordance with that purpose;
- Know the third parties to whom their personal data are transferred within or outside Türkiye;
- Request the correction of their personal data if they are incomplete or inaccurately processed and request that the action taken in this regard be notified to third parties to whom the personal data have been transferred;
- Request the deletion or destruction of their personal data where the reasons requiring their processing have ceased to exist, even though such data have been processed in accordance with the Personal Data Protection Law and other applicable legislation, and request that the action taken in this regard be notified to third parties to whom the personal data have been transferred;
- Object to the occurrence of a result against themselves arising from the analysis of the processed data exclusively through automated systems;
- Request compensation for damages in the event that they suffer damage due to the unlawful processing of their personal data.

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	15/20

LPPD COMPLIANCE POLICY



Pursuant to Article 13 of the Personal Data Protection Law, data subjects must submit their requests concerning the exercise of the above-mentioned rights to the Holding in writing or through other methods determined by the Personal Data Protection Board.

Right of Access to Personal Data:

Data subjects have the right to access their personal data free of charge. The legitimate interests of the Holding and its lawful basis for retaining personal data are protected under the Personal Data Protection Law and applicable legislation, while the data subject's rights to request the correction and deletion of their personal data are respected.

Naturel Holding informs data subjects of their right to:

- Learn whether their personal data are being processed;
- Request information where their personal data have been processed;
- Learn the purposes for which their personal data are processed and whether such data are used in accordance with those purposes;
- Request information about the third parties, within or outside Türkiye, to whom their personal data have been transferred.

Right to Correct or Delete Personal Data:

Data subjects have the right to request the correction or deletion of their personal data free of charge. In this context, data subjects have the right to:

- Request the correction of their personal data where such data are incomplete or inaccurately processed;
- Request the deletion or destruction of their personal data where the reasons requiring the processing of such data have ceased to exist;
- Request that the correction, deletion or destruction carried out as described above be notified to the third parties to whom their personal data have been transferred; and
- Object to the occurrence of a result to their detriment arising from the analysis of their processed data exclusively through automated systems.

Ensuring the Accuracy and Up-to-Date Status of Personal Data:

Pursuant to the Personal Data Protection Law, personal data must be accurate and, where necessary, up-to-date. Accordingly, data subjects are required to notify the Holding of any changes in their circumstances in order to ensure that their personal data remain accurate and up-to-date.

If a data subject fails to notify Naturel Holding and its subsidiaries in writing of any changes to their personal data, Naturel Holding and its subsidiaries shall not be held responsible for any damage, loss or sanctions arising or potentially arising from the failure to update such data.

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	16/20

LPPD COMPLIANCE POLICY



5.2 PROTECTION OF DATA SUBJECTS' RIGHTS

Pursuant to Article 12 of the Personal Data Protection Law, the data controller is required to take all necessary technical and administrative measures to ensure an appropriate level of security in order to:

- Prevent the unlawful processing of personal data;
- Prevent unlawful access to personal data; and
- Ensure the secure retention of personal data.

In accordance with the relevant provision of the Law, where personal data are processed on behalf of Naturel Holding by another natural or legal person, Naturel Holding and such person shall be jointly and severally liable for taking the measures specified in the first paragraph.

Naturel Holding conducts the necessary audits within its own organization or institution to ensure the implementation of the provisions of the Law.

Naturel Holding has incorporated this provision into all relevant contracts, undertakings and mutual agreements and has shared it with the persons to whom personal data may be transferred under this Policy. In cases where it is not possible or reasonable, due to factual impossibility or the ordinary course of business, to execute a contract or mutual agreement, this Policy is made publicly available through the Holding's website.

5.3 CIRCUMSTANCES IN WHICH DATA SUBJECTS MAY NOT EXERCISE THEIR RIGHTS

Pursuant to Article 28 of the Personal Data Protection Law, data subjects may not exercise the rights listed below in relation to the following circumstances, as such circumstances are excluded from the scope of the Law:

- Processing of personal data for purposes such as research, planning and statistical purposes by anonymizing such data for official statistical purposes;
- Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that such processing does not violate national defense, national security, public security, public order, economic security, privacy or personal rights, or constitute a criminal offense;
- Processing of personal data as part of preventive, protective or intelligence activities carried out by public institutions and organizations authorized and assigned by law for the purposes of ensuring national defense, national security, public security, public order or economic security; and
- Processing of personal data by judicial authorities or enforcement authorities in connection with investigation, prosecution, judicial proceedings or execution of sentences.

Pursuant to Article 28 of the Personal Data Protection Law, data subjects may not exercise any of the rights listed below, except for the right to request compensation for damages, in the following circumstances:

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	17/20

LPPD COMPLIANCE POLICY



- Where the processing of personal data is necessary for the prevention of crime or for a criminal investigation;
- Where personal data made public by the data subject themselves are processed;
- Where the processing of personal data is necessary for the performance of supervisory or regulatory duties or for disciplinary investigations or proceedings by public institutions and organizations and professional organizations having the status of public institutions, where such processing is based on the authority granted by law.

6.0 PROCESSING OF PERSONAL DATA OF JOB APPLICANTS

Personal data collected during the recruitment process of job applicants, as well as special categories of personal data collected depending on the nature of the position, are processed by Naturel Holding for the purposes specified below:

- To assess the qualifications, experience and interests of the job applicant and their suitability for the relevant position;
- Where necessary, to verify the accuracy of the information provided by the job applicant or to contact third parties and conduct inquiries regarding the job applicant;
- To communicate with the job applicant regarding the application and recruitment process or, where appropriate, to contact the applicant in relation to any position that may subsequently become available in Türkiye or abroad;
- To fulfill the requirements of applicable legislation or respond to requests from authorized institutions or organizations;
- To develop and improve the recruitment principles and practices implemented by Naturel Holding.

Personal data of job applicants may be collected through the following methods and means:

- Digital application forms published in written or electronic environments;
- CVs submitted to Naturel Holding and its subsidiaries by job applicants via email, courier, referrals and similar methods;
- Employment or recruitment agencies and consultancy companies;
- During interviews conducted via video conference, telephone or similar means, or in person;
- Checks conducted to verify the accuracy of information provided by the job applicant and inquiries conducted by Naturel Holding and its subsidiaries;
- Recruitment tests designed to assess the skills and personality traits of job applicants, administered by qualified professionals and evaluated based on their results.

Job applicants may also submit requests concerning their rights as data subjects through the methods described in this Policy.

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	18/20

LPPD COMPLIANCE POLICY



7.0 PERSONAL DATA PROCESSING ACTIVITIES CARRIED OUT WITHIN NATUREL HOLDING'S PREMISES AND THROUGH ITS WEBSITE

7.1 PERSONAL DATA PROCESSING ACTIVITIES CARRIED OUT AT BUILDING AND FACILITY ENTRANCES AND WITHIN THE BUILDINGS AND FACILITIES

Personal data processing activities carried out by Naturel Holding at building and facility entrances and within its premises are conducted in compliance with the Constitution, the Personal Data Protection Law and other applicable legislation.

For security purposes, Naturel Holding carries out personal data processing activities through security camera surveillance at its facilities and by monitoring and recording the entry and exit of visitors.

The use of security cameras and the recording of visitor entry and exit information constitute personal data processing activities carried out by the Holding.

7.2 VIDEO SURVEILLANCE ACTIVITIES CARRIED OUT AT BUILDING AND FACILITY ENTRANCES AND WITHIN THE PREMISES

This section provides information regarding Naturel Holding's video surveillance systems and explains how the privacy of personal data and the fundamental rights of individuals are protected.

As part of its security camera surveillance activities, Naturel Holding pursues purposes such as protecting its legitimate interests in ensuring the security of the Holding, its facilities and other persons.

Legal Basis for Video Surveillance Activities:

The video surveillance activities carried out by Naturel Holding are conducted in accordance with the Law on Private Security Services and other applicable legislation.

Video Surveillance Activities in Accordance with the Personal Data Protection Law:

Naturel Holding conducts video surveillance activities for security purposes in compliance with the provisions of the Personal Data Protection Law. In order to ensure security at Naturel Holding's facilities, video surveillance is carried out for the purposes prescribed under applicable legislation and in accordance with the conditions for the processing of personal data set forth under the Personal Data Protection Law.

Notification of Video Surveillance Activities:

In accordance with Article 10 of the Personal Data Protection Law, Naturel Holding provides data subjects with the necessary information regarding the processing of their personal data. Naturel Holding provides information concerning its video surveillance activities through multiple methods. This is intended to prevent interference with the fundamental rights and freedoms of data subjects, ensure transparency and fulfill the obligation to inform data subjects.

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	19/20

LPPD COMPLIANCE POLICY



In relation to its video surveillance activities, Naturel Holding publishes this Policy on its website (online information notice) and places notices at the entrances to areas subject to surveillance stating that video surveillance is conducted (on-site information notice).

Purpose and Limitation of Video Surveillance Activities:

In accordance with Article 4 of the Personal Data Protection Law, Naturel Holding processes personal data in a manner that is relevant, limited and proportionate to the purposes for which such data are processed.

The purposes of Naturel Holding's video surveillance activities are limited to the purposes set out in this Policy. Accordingly, the areas covered by security cameras, the number of cameras and the periods during which surveillance is conducted are determined and implemented to the extent necessary and limited to achieving the security purposes.

Areas where surveillance could result in an excessive interference with individuals' privacy beyond legitimate security purposes, such as restrooms, are not subject to video surveillance.

Ensuring the Security of Data Obtained:

In accordance with Article 12 of the Personal Data Protection Law, Naturel Holding takes the necessary technical and administrative measures to ensure the security of personal data obtained through video surveillance activities.

Retention Period of Personal Data Obtained Through Video Surveillance Activities:

Detailed information regarding the retention period of personal data obtained through Naturel Holding's video surveillance activities is provided in the section of this Policy concerning the Retention Periods of Personal Data.

Persons Authorized to Access and Recipients of Information Obtained Through Video Surveillance:

Access to live camera footage and digitally recorded and retained recordings is restricted to a limited number of authorized Naturel Holding employees.

The limited number of persons authorized to access the recordings undertake, by means of confidentiality undertakings, to maintain the confidentiality of the data to which they have access.

7.3 MONITORING VISITOR ENTRY TO AND EXIT FROM THE COMPANY'S BUILDINGS AND FACILITIES

Naturel Holding carries out personal data processing activities to monitor the entry to and exit from its facilities by visitors for the purpose of ensuring security and for the purposes specified in this Policy.

When the first and last names of individuals visiting Naturel Holding's facilities are collected, such data subjects are informed about the processing of their personal data through notices displayed at Naturel Holding's premises or through other written materials made available to visitors.

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Privacy	Unclassified
Document No	POL.LPPD.001
First Release	22.08.2025
Revision No	0.0
Revision Date	-
Page No	20/20

LPPD COMPLIANCE POLICY



The data collected for the purpose of monitoring visitor entry and exit are processed solely for this purpose, and the relevant personal data are recorded in the data recording system in a physical environment.

7.4 RETENTION OF RECORDS RELATING TO INTERNET ACCESS PROVIDED TO COMPANY VISITORS AND WEBSITE VISITORS

For the purposes of ensuring security and in accordance with the purposes set out in this Policy, Naturel Holding may record and retain log records relating to the internet access of visitors during their stay at our facilities, in accordance with the mandatory provisions of Law No. 5651 and the applicable legislation issued pursuant to this Law.

In this context, access to the log records obtained is restricted to a limited number of authorized Naturel Holding employees.

Such records are processed and shared with third parties only where requested by authorized public institutions and organizations, during internal audit processes carried out within Naturel Holding for the purpose of fulfilling our relevant legal obligations, and/or for the protection of our legal rights and the establishment of Naturel Holding's rights of defense.

7.5 VISITORS TO THE COMPANY'S WEBSITES

On the websites owned and operated by Naturel Holding and its subsidiaries, internet activity within the websites is recorded through technical means for the purposes of enabling visitors to use the websites in accordance with their intended purposes, displaying personalized content to visitors, and carrying out online advertising activities.

Detailed information regarding the protection and processing of personal data in connection with these activities carried out by Naturel Holding is provided in the "Privacy Policy" texts available on the relevant websites.

8.0 POLICY UPDATES

This Policy shall be reviewed by Management once a year and updated where deemed necessary.

9.0 REVISION HISTORY

Revision No	Rev. Date	Revised Titles	Explanations
0.0	22.08.2025		Initial Release

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	SUSTAINABILITY	CEO
DEMET DİKMEN	PINAR KARAMAN	TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.