

PROCEDURE ON TRANSFERRING PERSONAL DATA

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Our company Oriental Link Tütün Ticaret Anonim Şirketi (Oriental Link Tobacco Trade Joint Stock Company, “**OLT**” and/or “**Our Company**”) may transfer the personal data and private nature personal data of the owner of the personal data by taking the necessary security precautions according to the personal data processing targets, which are compatible with the law. Our Company acts according to the obligations anticipated in the article 8 of the Law on Protection of the Personal Data no: 6698 (the “Law”) for transferring the personal data, which she processes, to the third persons.

This Procedure on Transferring Personal Data (the “Procedure”) regulates the methods and principles about the personal data and personal data with private nature which are collected and processed by our Company and transferring them to the third persons resident in Turkey or in the abroad.

1. TRANSFERRING PERSONAL DATA

In cases where one or several of the conditions stated below doesn't exist, as a rule, the personal data of the related personal may only be transferred in case that the clear consent of this person is obtained. However, in case that one or several of the conditions below exists the personal data is transferred to the third persons such as our business partners, suppliers, affiliates, and consultants etc., by paying the maximum care by our company and by taking all security precautions, including the methods anticipated by the Personal Data Protection Board (the “Board”), even if there is no clear consent of the person.

- The activity related with the transfer of the personal data is clearly anticipated in the laws,
- The transfer of the personal data by our Company is directly related and necessary with the establishment or execution of a contract,
- The transfer of the personal data is necessary for our Company to fulfill a legal obligation,
- Provided that the personal data made public by the holder of the data, transferring by our Company in a way limited to the purpose of making public,
- Transferring the personal data by the Company is mandatory for establishing, using or protecting the rights of our Company or the holder of the data or the third persons,
- Having the personal data transfer activity is mandatory for the legitimate interests of our Company, provided that the basic rights and freedoms of the data holder are not damaged,
- It is mandatory for protecting the life or bodily integrity of a person himself, who is in a position which he can't state his consent due to de facto impossibility or the consent of who is not entitled to legal validity, or of another person.

In addition to above, the personal data shall be able to be transferred in case of the existence of any one of the conditions above to the third persons in the foreign countries

which it is announced as to have adequate protection by the Board. In case that there is no adequate protection, according to the data transfer conditions anticipated in the legislation, it shall be able to be transferred to the third persons in the foreign countries where the data officers in Turkey and in the related foreign country commit an adequate protection in written and that the board gave permission.

2. TRANSFERRING PERSONAL DATA WITH PRIVATE NATURE

The personal data with private nature, processed by our Company shall be able to be transfer to the third persons **by taking all kinds of necessary administrative and technical precautions, according to the principles stated in this Procedure and including the methods to be determined by the Board and in case that the conditions below exist** by our Company.

- (i) **The personal data with private nature, except health and sexual life**, in case that it is clearly anticipated by the law, in other words, there is a clear provision about transferring the personal data in the related law, may be transferred to the related third persons without asking for clear request of the owner of the data. Otherwise, the clear consent of the data owner shall be taken before transferring the data with private nature.
- (ii) **The personal data with private nature, related with health and sexual life** shall be able to be processed without asking for clear consent by the persons or authorized organizations and institutions that are under the confidentiality obligation in order to protect public health, to conduct protective medicine, medical diagnosis, treatment, and care services, to plan healthcare services and its finance and to be transferred to such institutions. Otherwise, the clear consent of the data owner shall be taken before transferring the data with private nature.

The personal data with private nature, including the health data, belonging to the employees of our Company, is transferred to the workplace physician of our Company and to the company providing Common Health and Security Unit service with respect to continue the service relationship between them and our Company and according to the Law on Work Health and Safety no: 6331 and the other work health and safety legislation.

The personal data with private nature, if it is necessary to transfer via e-mail, should be transferred as encrypted with the corporate e-mail address or by using the KEP account. If it is necessary to transfer through media such as portable memory, CD, DVD, it should be encrypted via cryptographic methods and the cryptographic key should be kept in another media. If the transfer between servers in different physical environment is done, the data transfer should be performed by establishing VPN between the servers or through sFTP method. If the transfer via paper media is necessary, the precautions should be taken, necessary for stealing, losing the paper, or seen by unauthorized persons and the document should be sent with "secret" format.

In addition to above, the personal data shall be able to be sent to the third persons resident in the countries having adequate protection in case of the existence of any one of the conditions above. In case that there is no adequate protection, according to the data transfer conditions anticipated in the legislation, it shall be able to be transferred to the third persons in the foreign countries where the data officers in Turkey and in the related foreign country commit an adequate protection in written and that the board gave permission.