HİTİT BİLGİSAYAR HİZMETLERİ A.Ş.
ETHICS HOTLINE PRIVACY NOTICE

a) Data Controller

Pursuant to the Law on the Protection of Personal Data No. 6698 ("**Law**"), your personal data may be processed by Hitit Bilgisayar Hizmetleri A.Ş. ("**Hitit**" or the "**Company**"), as the data controller, within the scope explained below.

b) Your Personal Data Collected

Your personal data listed below may be processed within the scope of the conduct of our Company's activities.

Personal Data Category	**Specific Personal Data**
Identity Information	Full name
Contact Information	Mobile phone number, e-mail address
Request/complaint Information	Complaint information received or collected from electronic and/or physical sources; information regarding actions taken in response to complaints received or collected through online channels; evaluation reports on complaints received or collected through online channels
Special Categories of Personal Data	Your special category personal data shared in the Ethics Violation Report Form

c) Purposes and Legal Grounds for Processing Personal Data

The collected personal data may be processed for the following purposes ("**Purposes**") and legal grounds and within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the Law.

Personal Data Categories	**Purposes of Personal Data Processing**	**Legal Grounds**
• Identity Information • Contact Information	• Ensuring the management of the Ethics Hotline by the Company, • Receiving and evaluating your whistleblowing reports and notifications, • Taking necessary actions and managing processes by analyzing the received whistleblowing reports and notifications, • Monitoring the received whistleblowing reports and notifications, • Preparing reports within the scope of whistleblowing reports and notification	***Based on the legal ground that processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject***
• Identity Information • Contact Information • Request/Compliant Information	• Fulfilling the requests of official authorities,	***Based on the legal reason that it is clearly stipulated by law and is mandatory for the data controller to fulfill its legal obligation***

	• Providing information to the competent official authorities pursuant to the legislation, • Ensuring compliance with the retention obligations stipulated in the legislation, • Responding to data subject requests in accordance with the legislation and taking necessary actions	
• Identity Information • Contact Information • Request/Compliant Information	• Receiving and evaluating your whistleblowing reports and notifications	***Based on the legal ground that data processing is necessary for the establishment, exercise or protection of any right***
<u>In the event that the subject matter of the whistleblowing report or notification relates to special categories of personal data;</u>		
• Special Categories of Personal Data	• Receiving and evaluating your whistleblowing reports and notifications	***Based on the legal ground that data processing is necessary for the establishment, exercise or protection of any right***

d) Recipient Parties and Purposes for Transferring Personal Data

Your personal data may be transferred within the scope of the data processing conditions set out in Articles 5 and 6 of the Law, in compliance with the rules regarding the transfer of personal data specified in Article 8 of the Law.

Recipients / Recipient Groups	Legal Ground and Purpose of Transfer
• Our suppliers *(refers to all third-party service providers from whom goods and services are procured for the provision of our services and the conduct of our activities)*	***Based on the legal grounds underlying the above-mentioned Purposes, within the scope of the fulfillment of such Purposes*** • The procurement by our Company of consultancy, information security, archiving, and support services for the fulfillment of the above-mentioned Purposes
• Legally authorized public institutions and legally authorized private organizations *(refers to private and public institutions and organizations authorized to request information and documents due to the relevant legal regulations or legal processes, private and public institutions and organizations to which the transfer of information is mandatory pursuant to legal regulations, and private and public institutions and organizations with which we verify information in order to ensure the security of legal transactions)*	***Based on the legal reason that it is clearly stipulated by law and is mandatory for the data controller to fulfill its legal obligation;*** • Fulfillment of legal reporting and information requests, • Conduct of legal audit activities, • Execution of legal processes, • Fulfillment of our obligations arising from legislation

e) Method for the Collection of Personal Data

Your personal data may be collected by the Company, in an electronic environment within the scope of fulfilling the Purposes, through the channel via which you submit your whistleblowing report, namely the Ethics Hotline website and call center channels.

f) Data Subject's rights Specified under Article 11 of the Law

If as the data subject you submit your requests regarding your rights listed under article 11 of the Law to our Company through the methods set out below, our Company will finalize such requests as soon as possible and in any event within thirty days, free of charge, depending on the nature of the request. However, if the transaction requires an additional cost, the fee set out in the tariff determined by the Personal Data Protection Board shall be charged by our Company. In this context, pursuant to Article 13(1) of the Law, you may submit your request regarding the exercise of your rights specified above to our Company in writing or through other methods to be determined by the Personal Data Protection Board in the future. Within this framework, the channels and procedures through which you may submit your applications to our Company in writing pursuant to Article 11 of the Law are explained below.

In order to exercise your rights specified above, you may submit your application to Hitit by using one of the following methods, based on the sample of the Data Subject Application Form available at https://hitit.com/themes/hitit/documents/2026-02/ilgili-kisi-basvuru-formu.pdf

- By sending a wet-signed copy of the Data Subject Application Form to the address *"Hitit Bilgisayar Hizmetleri A.Ş., Reşitpaşa Mah. Katar Cad. No:4/1 Arı Teknokent 2, Inner Door No:601, Maslak 34469, Sarıyer, Istanbul"* via a notary public or by submitting it in writing or by using a registered electronic mail (KEP) address, secure electronic signature, mobile signature, or the electronic mail address previously notified by the data subject to the data controller and registered in the data controller's system,

to Hitit.