



MILK ACADEMY SÜT ÜRÜNLERİ SANAYİ VE TİCARET ANONİM ŞİRKETİ

PERSONAL DATA PROTECTION NOTICE

1. PURPOSE

As **Milk Academy Süt Ürünleri Sanayi ve Ticaret Anonim Şirketi** ("MILK ACADEMY"), our primary objective is to ensure that the personal data of natural persons -including our customers, visitors to our websites or facilities, our natural person suppliers and their natural person employees, our potential employees, former employees, and current employees- are processed in compliance with the Personal Data Protection Law No. 6698 ("KVKK"), other applicable legislation in force in Turkey, secondary legislation based on KVKK, and the resolutions of the Personal Data Protection Board, and to enable such individuals to effectively exercise their rights regarding their personal data.

2. SCOPE

This clarification text covers all types of personal data processed by **MILK ACADEMY**. It applies to all personal data processing activities owned or managed by **MILK ACADEMY** and is drafted in consideration of the Personal Data Protection Law and relevant international standards.

3. DEFINITIONS AND ABBREVIATIONS

The following terms and abbreviations shall have the following definitions throughout this clarification text:

- **Personal Data:** Any information relating to an identified or identifiable natural person.
- **Data Subject:** The natural person whose personal data is processed.
- **Processing of Personal Data:** Any operation performed on personal data, whether wholly or partially by automatic means, or by non-automatic means, provided that it is part of a data recording system, such as collection, recording, storage, retention, alteration, reorganization, disclosure, transfer, acquisition, making available, classification, or prevention of use.
- **Data Processor:** A natural or legal person who processes personal data on behalf of the data controller in the capacity granted by the data controller.

- **Data Controller:** A natural or legal person who determines the purposes and means of processing personal data and is responsible for setting up and managing the data recording system.
- **KVKK or Law:** Refers to Personal Data Protection Law No. 6698.
- **Board:** Refers to the Personal Data Protection Board.
- **VERBIS:** Refers to the Data Controllers Registry Information System.
- **Explicit Consent:** Freely given, informed, and specific consent, expressed clearly without doubt, and limited to a particular processing activity.
- **Anonymization:** Rendering personal data impossible to associate with an identified or identifiable natural person under any circumstances, even by matching it with other data.
- **Employee:** Refers to employees employed under **MILK ACADEMY**.

4. DUTIES AND RESPONSIBILITIES

4.1 Personal Data We Hold

The main categories of personal data processed by **MILK ACADEMY** include:

1. **Identity information:** Your first and last name, sex, and date of birth.
2. **Contact information:** Your phone number or email address.

The purposes and conditions of processing the above personal data, the groups of data subjects, the recipients of the transferred data, whether data is transferred abroad, and the security measures taken are compiled in an inventory and registered to VERBIS by **MILK ACADEMY** as Data Controller. These records are publicly accessible at <https://verbis.kvkk.gov.tr/>.

5. LEGAL OBLIGATIONS

Our legal obligations as the Data Controller regarding the protection and processing of personal data under KVKK are listed below:

5.1 Obligation to Inform

As a Data Controller, we are obliged to inform data subjects during the collection of their personal data regarding:

- The purposes for which their personal data will be processed,
- Our identity and, if any, the identity of our representative,
- To whom and for what purpose their personal data may be transferred,

- Our data collection method and its legal basis,
- Notifications in case of data breaches,
- The rights granted under the Law.

Accordingly, **MILK ACADEMY** ensures that this publicly available clarification text is clear, understandable, and easily accessible. In addition, in the event of any personal data security breach, both the Personal Data Protection Board and the relevant individuals will be notified without delay.

5.2 Obligation to Ensure Data Security

As a Data Controller, we take the necessary administrative and technical measures stipulated by law to ensure the security of the personal data we hold. This includes preventing processing of or accessing personal data in breach of the law and company policies/codes, securely storing personal data, and properly carrying out data destruction processes in compliance with legislation and company policies/codes.

6. PROCESSING OF PERSONAL DATA

6.1 Our Principles in Processing Personal Data

- We process personal data lawfully, fairly, and transparently, fulfilling our obligation to inform.
- We take all necessary measures in our data processing procedures to ensure that the data is accurate and up to date, and provide Data Subjects with opportunities to apply for the update or correction of their data.
- As **MILK ACADEMY**, we process personal data for legitimate purposes in line with legislation and commercial requirements, in a manner that is clearly defined in terms of scope and content.
- We process personal data only for specified, explicit, and legitimate purposes, and in a limited and proportionate manner. We avoid processing irrelevant or unnecessary personal data. Therefore, we do not process special categories of personal data unless mandated by law, or in the event that we need to process such personal data, we obtain the explicit consent of the relevant individuals.
- The legislation sets out a series of regulations requiring the storage of various personal data for specific periods. Therefore, we retain personal data for the period required by relevant legislation or for processing. Once the retention period expires or the purpose ceases, personal data will be deleted, destroyed, or anonymized.

6.2 Purposes of Processing Personal Data

We process personal data for the following purposes:

- Conducting corporate activities,
- Complying with legal obligations and regulatory requirements,
- Evaluating job applications,
- Communicating with persons in contractual relationships with **MILK ACADEMY**,
- Supporting employee training, development, and career processes,
- Providing information to authorized persons, institutions, and organizations,
- Following and executing legal processes,
- Managing dealers/suppliers,
- Ensuring corporate communication,
- Protecting employee rights.

7. TRANSFER OF PERSONAL DATA

We ensure that personal data is accessible only to individuals who need such access to perform their duties and to third parties with a legitimate purpose. In each case where third parties are granted access, we will take appropriate measures to ensure compliance with this clarification text and to safeguard confidentiality and integrity. Personal data we process may be recorded in automated systems used by **MILK ACADEMY** to effectively conduct its operations. With the knowledge and explicit consent of the Data Subjects, such data may be processed by the local and global affiliates and subsidiaries of MILK ACADEMY, and service providers acting as data processors under confidentiality obligations.

8. RETENTION OF PERSONAL DATA

8.1 Retention of personal data for the period stipulated in the relevant legislation or required for the processing purpose

MILK ACADEMY is obliged to retain personal data for the period required for the purpose of processing personal data, subject to the retention periods stipulated in the legislation. Personal data is retained for the duration prescribed by law or as long as necessary for the purpose of processing. The data is stored in physical (departmental cabinets, archives) or electronic (servers, cloud, etc.) media. **MILK ACADEMY** shall take necessary measures to store and protect personal data and ensure the security of the media. Data integrity is prioritized in all digital and physical storage media. In cases we process personal data for multiple purposes, once the processing purposes cease or upon the request of the Data Subject and provided that the legislation allows the

deletion of the data, personal data will be deleted, destroyed, or anonymized. The requirements under the Personal Data Protection Law shall be observed.

9. DELETION, DESTRUCTION, AND ANONYMIZATION OF PERSONAL DATA

9.1 Conditions for Deletion or Destruction

Personal data will be deleted, destroyed, and/or anonymized under the following conditions:

- The absence of circumstances requiring processing or retention of personal data,
- Absence or withdrawal of explicit consent by the Data Subject, approved by the Data Controller,
- Expiration of the maximum legal retention period,
- Approval by the Personal Data Protection Board of data destruction requests.

9.2 Methods of Deletion and Destruction

The methods used for the deletion and destruction of personal data are listed below. Depending on the storage format of personal data, one of the following methods shall be used.

9.2.1 Destruction of Personal Data Stored as Physical Documents:

The responsibility for the secure destruction of data stored as documents and in physical environments (cabinets and/or archives) shall lie with the heads of the departments processing such data. Such documents will be securely destroyed by shredding, burning, cutting, or similar methods, ensuring they cannot be restored or read. Specialized data destruction service providers may be engaged for such destruction of personal data.

9.2.2 Deletion of Personal data Stored in Electronic Media:

The responsibility for securely deleting and destroying data stored in electronic media shall be borne by the Information Technology department. Digitally stored data shall be deleted in a manner that prevents access by unauthorized parties or destroyed in a manner that prevents its reuse. Any operations performed on data stored in any physical or electronic medium and subsequently destroyed shall be recorded by the Information Technology department.

10. RIGHTS OF DATA SUBJECTS

Data Subjects have the following rights concerning their personal data:

- To learn whether their personal data is being processed,
- To request information regarding such processing,

- To learn the purposes of processing and whether the data is used accordingly,
- To know the third parties to whom personal data is transferred domestically or abroad,
- To request correction of incomplete or inaccurate data,
- To request deletion or destruction of personal data where the reasons for processing no longer exist,
- To request notification of correction, deletion, or destruction to third parties to whom data has been transferred,
- To object to results arising to their detriment from automated data analysis,
- To claim compensation for damages incurred due to unlawful processing.

10.1 Exercising Rights regarding Personal Data

Data Subjects whose data is processed in compliance with the instructions of Data Controller **MILK ACADEMY** are entitled to apply to the Data controller pursuant to Article 13 of the Personal Data Protection Law to exercise their rights under Article 11 of the Personal Data Protection Law. **MILK ACADEMY** shall respond **within a maximum of 30 (thirty) days**, either accepting the application or rejecting it with justification. Applications must meet the requirements set out in the Communiqué on Application Procedures and Principles to the Data Controller for such application to be accepted as a duly made application.

- Furthermore, for an application to be considered as a duly submitted application and eligible for evaluation, it must include all of the following elements.
Applicant's full name and, if in writing, signature,
- For Turkish citizens, Turkish ID number; for foreigners, nationality, passport number, or ID number if available,
- Residential or workplace address for notifications,
- If available, email address, phone, and fax number for notifications,
- The subject of the request.

Within this scope, an application containing all matters stipulated in the Communiqué on the Procedures and Principles for Applying to the Data Controller in order to exercise the rights granted to the data subjects under Article 11 of the Law must be submitted to **MILK ACADEMY** either via registered mail, in person, or electronically with a secure electronic signature, using the contact details provided in this clarification text.

For questions regarding this clarification text or other personal data protection practices of **MILK ACADEMY**, or to exercise their rights under KVKK, Data Subjects may contact

the Data Protection Committee at info@milcademy.com.tr or milcademy@hs06.kep.tr.