

PERSONAL DATA PROTECTION AND PROCESSING POLICY OF ANADOLU EFES

1. Purpose and Scope

Anadolu Efes Biracılık ve Malt Sanayii Anonim Şirketi (“Efes” or the “Company”) uses its best endeavours to comply with all applicable legislation with respect to the processing and protection of personal data.

Within the frame of the Personal Data Protection and Processing Policy of Anadolu Efes Biracılık ve Malt Sanayii Anonim Şirketi (the “Policy”), the principles which are adopted in the course of personal data processing activities conducted by Efes are set forth.

With the Policy, the sustainability of the “principle of performing the business activities of Efes in a transparent manner” is targeted. Within this scope, the essential principles adopted for the compliance of the data processing activities by Efes with the regulations provided in the 6698 numbered Personal Data Protection Law (the “Law”) are determined and the practices carried out by Efes are highlighted.

The Policy is applicable to real persons whose personal data are processed by Efes through automated means or non-automated ways on condition of being a part of any data recording system and the considerations related to the protection of personal data of Efes employees are separately regulated in the “Personal Data Protection and Processing Policy for the Employees of Anadolu Efes Biracılık ve Malt Sanayii Anonim Şirketi”.

2. Principles of the Policy

2.1 General Principles

The Policy is published in the website of Efes (<https://www.anadoluefes.com/>) in an accessible manner by data subjects. In parallel with any amendments and renewals in the legislation, the revisions to be made in the Policy shall be made accessible so that data subjects can easily review them.

In case of a conflict between the applicable legislation concerning personal data protection and processing and this Policy, Efes agrees that the legislation in force shall be applied.

2.2 Groups of Persons within the Scope of the Policy

The data subject groups who are covered by this Policy and whose personal data are processed by Efes are as follows:

- **Prospective Employees**
The persons who have not enter into a service agreement with Efes, but are subjected to an assessment process by Efes for this purpose.
- **Authorized Officers and Employees of Business Partners**
Real person authorized officers, shareholders and employees of the organizations with whom Efes is in a business relationship.
- **Company Visitors**
Real persons who visit Efes’s buildings or the websites operated by Efes.

PERSONAL DATA PROTECTION AND PROCESSING POLICY OF ANADOLU EFES

- **Other Real Persons**

All real persons who are not covered by the Personal Data Protection and Processing Policy for the Employees of Anadolu Efes Biracılık ve Malt Sanayii Anonim Şirketi.

3. Finalization of the Requests of Personal Data Subjects

In the event that data subjects communicate their requests concerning their personal data to our Company in writing, Efes manages the required processes in its capacity as the data controller in accordance with article 13 of the Law to ensure the finalization of such request as soon as possible and within not later than thirty (30) days depending on the nature of the request.

For the purpose of ensuring data security, Efes might request information to verify if any applicant is the owner of the personal data subjected to the application. Our Company might also direct any question to a personal data subject with regard to his/her application in order to ensure the finalization of the application in compliance with the request.

In case that an application made by a data subject is likely to prevent the rights and freedoms of other persons, requires disproportionate effort or otherwise the data is a publicly available data, the request shall be able to be rejected by Efes with the explanation of the justification thereof.

3.1 Rights of Personal Data Subjects

According to article 11 of the Law, you can refer to our Company and make a request about the following issues:

- (1) Learning whether your personal data are processed or not,
- (2) Requesting information about the processing activity if your personal data have been processed,
- (3) Learning the purpose of processing of your personal data and whether these data are used suitably for this purpose,
- (4) Knowing any third parties in Turkey or abroad to whom your personal data are transferred,
- (5) Requesting the correction of your personal data if they are processed incompletely or incorrectly and asking the notification of such correction to the third parties to whom your personal data are transferred within this scope,
- (6) Requesting the deletion or destruction of your personal data and asking the notification of such deletion or destruction to the third parties to whom your personal data are transferred within this scope in the event that the reasons requiring the processing of your personal data disappear in terms of purpose, duration and legitimacy although they have been processed in compliance with the Law and other applicable legislations,
- (7) Raising an objection against any result to your disadvantage which is obtained by way of analysis of the processed data exclusively through automatic systems,
- (8) Requesting the indemnification of any loss if you incur a loss due to unlawful processing of your data.

3.2 The Situations Beyond the Rights of Personal Data Subjects as Required by the Legislation

Pursuant to article 28 of the Law, personal data subjects shall not be able to claim any right in terms of the following situations on the grounds that the situations below are not included in the scope of the

PERSONAL DATA PROTECTION AND PROCESSING POLICY OF ANADOLU EFES

Law:

- (1) Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression on condition of not violating national defence, national security, public security, public order, economic security, right of privacy or personal rights or not constituting a crime.
- (2) Processing of personal data for research, planning and statistics purposes by way of being anonymized through official statistics.
- (3) Processing of personal data within the scope of preventive, protective and informative activities conducted by public institutions and organizations which are entitled and empowered by the law for ensuring national defence, national security, public security, public order or economic security.
- (4) Processing of personal data by judicial authorities or executive authorities with respect to investigation, prosecution, litigation or execution proceedings.

According to article 28/2 of the Law, personal data holders shall not be able to claim their rights in following cases except for requesting the indemnification of a loss:

- (1) Personal data processing is required for preventing the committing of a crime or for a criminal investigation.
- (2) Any personal data which are made public by personal data subject are processed by him/her.
- (3) Personal data processing is required for the performance of auditing or regulating duties or for a disciplinary investigation or prosecution by empowered and authorized public institutions and organizations as well as professional organizations in the nature of a public institution by the power vested in by law.
- (4) Personal data processing is required for the protection of economic and financial interests of the Government with regard to budget, tax and finance related issues.

4. Achievement of Security and Confidentiality of Personal Data

All required measures are taken by Efes for the prevention of unlawful disclosure of, access to or transfer of personal data or any other security deficits depending on the nature of the data to be protected within the bounds of possibility.

Within this scope, all kinds of (i) administrative and (ii) technical measures are taken, (iii) an audit system is established within the structure of the Company and (iv) the measures stipulated in the Law are followed by Efes in case of unlawful disclosure of personal data.

(1) Administrative measures taken by Efes for preventing unlawful processing of and unlawful access to personal data

- Efes trains its employees with respect to the law on the protection of personal data and raises their awareness.
- In cases where personal data are subjected to a transfer, Efes ensures that some provisions are included in the agreements executed with the persons to whom personal data are transferred which suggest that the party to whom personal data are transferred shall

PERSONAL DATA PROTECTION AND PROCESSING POLICY OF ANADOLU EFES

comply with the obligations concerning the achievement of data security.

- The personal data processing activities conducted by Efes are reviewed in detail and, within this scope, the actions required to be taken for compliance with the conditions of personal data processing as stipulated by the Law are identified.
- Efes determines the practices required to be adopted for compliance with the Law and draws up internal policies for these practices.

(2) Technical measures taken by Efes for ensuring lawful processing of personal data and preventing unlawful access to personal data

- Efes takes technical measures to the extent permitted by technology for personal data protection and the measures taken are updated and improved in parallel with the developments.
- Qualified personnel are employed for technical aspects.
- Audits are performed at regular intervals for the implementation of the measures taken.
- Such software and systems that will ensure security are installed.
- Power to access to personal data processed within the structure of Efes is limited to the relevant employees depending on the identified purpose of processing.

(3) Performance of audit activities by Efes for the protection of personal data

The functioning of the technical and administrative measures taken for the protection of personal data and achievement of safety thereof is audited and such practices that will ensure the maintenance thereof are carried out by Efes. The results of audit activities performed within this scope are reported to the respective department within the structure of Efes. In line with the audit results, some activities are conducted for the development and improvement of the measures taken for data protection.

(4) Measures to be taken in case of unlawful disclosure of personal data

If personal data are obtained by unauthorized persons in an unlawful manner within the scope of personal data processing activity conducted by Efes, this shall be notified to the Personal Data Protection Board and respective data subjects without delay.

5. Designation of the Unit Responsible for Personal Data Protection and Processing

The “**Personal Data Protection Unit**” has been established by Efes to ensure the required coordination within the structure of the company for the purpose of achieving and maintaining compliance with the applicable legislation on personal data protection. The Personal Data Protection Unit is responsible for securing uniformity between the units of Efes and managing and improving the systems installed for achieving the compliance of the activities performed with the legislation on personal data protection.

Within this scope, main duties of the Personal Data Protection Unit are set forth below:

- To prepare and put the essential policies related to the protection and processing of the

PERSONAL DATA PROTECTION AND PROCESSING POLICY OF ANADOLU EFES

- employees' personal data into effect,
- To decide how the policies concerning the protection and processing of the employees' personal data will be implemented and audited and within this framework, carry out appointments in the Company and ensure the coordination,
 - To identify the actions to be taken for ensuring compliance with the Law and the respective legislation, supervise the performance and ensure coordination thereof,
 - To raise the awareness in the Company and before the organizations with whom the Company cooperates in terms of the protection and processing of personal data,
 - To ensure the taking of required measures by identifying the risks that might occur in the personal data processing activities of the Company and make improvement recommendations,
 - To design and enable the provision of trainings with respect to personal data protection and implementation of the policies,
 - To finalize the applications of personal data subjects at the highest level,
 - To coordinate the performance of briefing and training activities for the purpose of ensuring that personal data subjects are informed about the personal data processing activities of the Company and their legal rights,
 - To prepare and put the revisions in the essential policies concerning the protection and processing of personal data into effect,
 - To follow the developments and arrangements with respect to personal data protection and make recommendations to the top management about the actions to be taken for the Company's operations in parallel with such developments and arrangements,
 - To manage the relationships with the Personal Data Protection Board and Personal Data Protection Authority,
 - To carry out the other duties to be entrusted by the management of the Company in terms of personal data protection.

6. Purposes of Personal Data Processing and Personal Data Groups Subjected to the Data Processing Activity

6.1 Personal Data Categories

The personal data in the following groups are processed by Efes either partially or completely in an automated or non-automated manner as a part of the data recording system.

PERSONAL DATA CATEGORIES	DESCRIPTION
Identifying information	Personal data about the identity of the person on driving licence, identity card, passport etc. containing such information as first and last name, Turkish ID number, nationality, mother's and father's name, place of birth, date of birth, gender as well as taxpayer ID number, SSI number, signature, car plate number etc.
Contact details	Contact details with such personal data as telephone number, address, e-mail address, fax number etc.

PERSONAL DATA PROTECTION AND PROCESSING POLICY OF ANADOLU EFES

Physical space security information	Personal data concerning the records and documents obtained at the time of stay in a physical space in case of entry in a physical space such as camera records, fingerprint records, any records taken at the security point etc.
Transaction information security	Personal data processed for ensuring technical, administrative, legal and commercial security of either the data subject or the Company during the performance of business activities by Efes.
Risk management information	Personal data processed through the methods which are adopted in compliance with the generally accepted legal, commercial, procedural and integrity related rules for the management of commercial, technical and administrative risks.
Financial information	Personal data processed for any information, documents and records showing all kinds of financial outcomes within the scope of the legal relationship between Efes and data subject and such personal data as bank account number, IBAN number, credit card details, financial profile, property data, income data etc.
Information on legal proceedings and compliance	Personal data processed for the determination and follow-up of Efes's legal receivables and rights and settlement of its debts and within the scope of compliance with legal obligations and Efes's policies.
Audit and information supervision	Personal data processed within the scope of compliance with Efes's legal obligations and the Company's policies.
Sensitive personal data	The data set forth in article 6 of the Law (for example, health data including blood group, biometric data etc.).
Information request/complaint management on	Personal data related to the receipt and assessment of all kinds of requests and complaints directed to Efes.
Information on management reputation	Personal data which are associated with a person and collected for the purpose of protecting the commercial reputation of Efes (for example, posts related to Efes).

6.2 Personal Data Processing Purposes and Legal Reasons

Personal data are processed by Efes for the following purposes in compliance with the data processing conditions and principles. The existence of the purposes below may vary specific to each data subject.

Efes processes personal data by obtaining the explicit consent of the subject in accordance with the Law or limited to the purposes and conditions within the personal data processing conditions specified in paragraph 2 of Article 5 and paragraph 3 of Article 6 of the Law.

Therefore, the explicit consent of the personal data subject is only one of the legal grounds that make it possible to process personal data in accordance with the law. The basis of personal data processing activity may be only one of the following conditions, or more than one of these conditions may be the basis of the same personal data processing activity.

PERSONAL DATA PROTECTION AND PROCESSING

POLICY OF ANADOLU EFES

One of the conditions for processing personal data is the explicit consent of the data subject. The explicit consent of the personal data subject must be related to a specific subject, based on information and free will.

The cases where personal data can be processed without explicit consent are as follows:

- Explicitly stipulated in the laws,
- It is necessary for the protection of the life or physical integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid,
- Provided that it is directly related to the conclusion or performance of a contract, it is necessary to process personal data of the parties to the contract,
- It is mandatory for the data controller to fulfil its legal obligation.
- It has been publicized by the data subject,
- Data processing is mandatory for the establishment, exercise or protection of a right,
- Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

In Case Of Processing Of Special Categories Of Personal Data:

Efes sensitively complies with the regulations stipulated in the Law in the processing of personal data determined as 'special quality' by the Law.

In this context, in Article 6 of the Law, certain personal data that have the risk of causing victimization or discrimination when processed unlawfully are determined as 'special categories'. Special categories of personal data can be processed by Efes in accordance with the Law and provided that adequate measures to be determined by the Personal Data Protection Board ("Board") are taken in the following cases:

- If there is explicit consent of the personal data subject,
- If expressly provided for in the law,
- In the event that it is necessary for the protection of the life or physical integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid, or for the protection of the life or physical integrity of himself/herself or of another person,
- If it is related to the personal data made public by the data subject and in accordance with the will of the data subject to make it public,
- If it is mandatory for the establishment, use or protection of a right,
- If it is necessary for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning, management and financing of health services by persons under the obligation to keep secrets or authorised institutions and organisations,
- If it is necessary for the fulfilment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance,
- In the case of foundations, associations and other non-profit organisations or formations established for political, philosophical, religious or trade union purposes, provided that they comply with the legislation to which they are subject and their purposes, are limited to their

PERSONAL DATA PROTECTION AND PROCESSING

POLICY OF ANADOLU EFES

fields of activity and are not disclosed to third parties; to their current or former members and members or to persons who are in regular contact with these organisations and formations

The personal data obtained are processed by Efes, based on at least one of the legal grounds for processing personal data specified in Articles 5 and 6 of the Law, and for the purposes listed below:

- Planning and performance of business activities
- Follow-up of legal affairs
- Creation and follow-up of visitors' records
- IT and operational audit works for Group Companies
- Follow-up of financing and/or accounting works
- Planning and performance of the operational activities required for the performance of business activities in compliance with the Company's procedures and/or respective legislation
- Provision of information with the competent authorities as required by the legislation
- Efficiency management
- Planning and/or performance of customer satisfaction activities
- Management of relationships with business partners and/or suppliers
- Planning and/or performance of corporate communication activities for the employees and/or corporate social responsibility activities participated by the employees and/or activities of nongovernmental organizations
- Planning and performance of customer relations management processes
- Planning and performance of corporate communication activities
- Complaint management
- Research
- Planning and performance of market research activities for the sales and marketing of the goods and services
- Planning of corporate communication activities
- Planning and performance of the employees' authorizations to access the information systems
- Communication management
- Follow-up of the contractual processes and/or legal claims
- Performance of strategic planning activities
- Planning and management of sales and marketing processes for the goods and services
- Planning and/or management of the processes for ensuring and/or increasing loyalty to the Company's goods and/or services
- Planning and management of the sales processes for the goods and/or services
- Planning and/or performance of efficiency/effectiveness and/or suitability analyses for business activities
- Planning and performance of the audit activities of the Company
- Follow-up and/or audit of the employees' business activities
- Achievement of accurate and updated data
- Planning and/or management of production related and/or operational risk processes of

PERSONAL DATA PROTECTION AND PROCESSING POLICY OF ANADOLU EFES

the Company

- Planning and performance of corporate sustainability activities
- Planning and performance of corporate governance activities
- Planning and performance of internal orientation activities
- Planning and management of production and/or operation processes
- Planning and performance of external training activities
- Achievement of the security of fixtures and/or resources of the Company

6.3 Transfer of Personal Data to Third Parties

Transfer of Personal Data to Domestic Third Parties

In the event that one or more of the following data processing conditions exist, personal data may be transferred to third parties by our Company by taking all necessary security measures, including the methods stipulated by the Board.

- The data subject consents to the transfer of his/her personal data to third parties resident in the country,
- The relevant activities regarding the transfer of personal data are clearly stipulated in the laws,
- The transfer of personal data by the Company is directly related and necessary for the establishment or performance of a contract,
- The transfer of personal data is mandatory for our Company to fulfil its legal obligations,
- Transfer of personal data by our Company limited to the purpose of publicization, provided that the personal data has been made public by the data subject,
- The transfer of personal data by the Company is mandatory for the establishment, use or protection of the rights of the Company or the data subject or third parties,
- It is mandatory to carry out personal data transfer activity for the legitimate interests of the Company, provided that it does not harm the fundamental rights and freedoms of the data subject,
- It is mandatory for the protection of the life or physical integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid.

Transfer of Personal Data to Third Parties Residing Abroad

The transfer of personal data abroad by our Company will be carried out in accordance with Article 9 of the Law and the principles set out in this Policy by taking technical and administrative measures in the direction described below:

(i) Transfer Based on the Adequacy Decision Made on the Relevant Country, International Organisation or Sectors within the Country

Personal data may be transferred abroad by the Company if one of the conditions specified in Articles 5 and 6 of the Law exists and if there is an adequacy decision issued by the Board regarding the country, international organisation or sectors within the country to which the transfer will be made.

The adequacy decision is issued by the Board and published in the Official Gazette. The Board may also take the opinion of relevant institutions and organisations if necessary. The adequacy decision is evaluated

PERSONAL DATA PROTECTION AND PROCESSING

POLICY OF ANADOLU EFES

every four years at the latest. The Board may modify, suspend or revoke the adequacy decision with prospective effect as a result of the assessment or in other cases it deems necessary.

(ii) Transfer Based on Appropriate Safeguards

In the absence of an adequacy decision, personal data may be transferred abroad by the Company if one of the following appropriate safeguards is provided by the parties, provided that one of the personal data processing conditions specified in Articles 5 and 6 of the Law exists and the data subject has the opportunity to exercise his/her rights and to apply for effective legal remedies in the country where the transfer will be made:

- **Special Transfer Reason for Public Institutions and Organisations or Professional Organisations of Public Nature:** Existence of an agreement that is not in the nature of an international contract between public institutions and organisations or international organisations abroad and public institutions and organisations or professional organisations in the nature of a public institution in Turkey and the Board's permission for the transfer.
- **Binding Corporate Rules:** Existence of binding corporate rules approved by the Board and containing provisions on the protection of personal data, which the companies within the group of undertakings engaged in joint economic activities are obliged to comply with.
- **Standard Contracts:** Existence of a standard contract announced by the Board, including data categories, purposes of data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data recipient, additional measures taken for special categories of personal data, and notifying the Board about this standard contract within the legal periods.
- **Letter of Undertaking:** Existence of a written letter of undertaking containing provisions to ensure adequate protection and authorisation of the transfer by the Board.

(iii) Transfer Based on Incidental Circumstances

Personal data may be transferred abroad by the Company in the absence of an adequacy decision and if one of the appropriate assurances cannot be provided, provided that it is incidental, in the presence of one of the following cases:

- **Informed Special Explicit Consent for Possible Risks:** The explicit consent of the data subject to the transfer, provided that the data subject is informed about the possible risks.
- **Execution of the Contract and Implementation of Pre-Contractual Measures:** The transfer is mandatory for the performance of a contract between the data subject and the data controller or for the implementation of pre-contractual measures taken upon the request of the data subject.
- **Third Party Contracts for the Benefit of the Data Subject:** The transfer is necessary for the conclusion or performance of a contract between the controller and another natural or legal person for the benefit of the data subject.
- **Necessity for a Superior Public Interest:** The transfer is necessary for a superior public interest.
- **Establishment, Exercise or Protection of Right:** The transfer of personal data is mandatory for the establishment, exercise or protection of a right.
- **Actual Impossibility:** It is mandatory to transfer personal data for the protection of the life

PERSONAL DATA PROTECTION AND PROCESSING POLICY OF ANADOLU EFES

or physical integrity of the person or another person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid.

- **Transfer from Public Registers:** Transfer from a registry open to the public or persons with legitimate interests, provided that the conditions required to access the registry in the relevant legislation are met and the person with a legitimate interest requests it.

Transfer of Special Categories of Personal Data to Domestic Third Parties

As a rule, it is prohibited to transfer special categories of personal data. However, as Efes, special categories of personal data are processed in accordance with the principles set out in this Policy and in the presence of the following conditions specified in Article 6 of the Law:

(i) Explicit Consent of the data subject

One of the conditions for processing special categories of personal data is the explicit consent of the data subject. The explicit consent of the data subject must be related to a specific subject, based on information and with free will.

In the presence of the following special categories of personal data processing conditions, personal data may be processed without the explicit consent of the data subject:

(ii) Explicitly Stipulated by Laws

If the special categories of personal data of the data subject are explicitly stipulated in the law, in other words, if there is an explicit provision in the relevant law regarding the processing of special categories of personal data, this data processing condition may be mentioned.

(iii) Failure to Obtain Explicit Consent of the Data Subject Due to Actual Impossibility

The personal data of the data subject may be processed if it is mandatory to process the personal data of the data subject in order to protect the life or physical integrity of the data subject or another person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be validated.

(iv) Publicization of Special Categories of Personal Data of the data subject

In the event that the data subject has made his/her sensitive personal data public in accordance with his/her own will to make it public, the relevant special categories of personal data may be processed limited to the purpose of making it public.

(v) Data Processing is Mandatory for the Establishment or Protection of a Right

If data processing is mandatory for the establishment, exercise or protection of a right, the special categories of personal data of the data subject may be processed.

(vi) Processing is Necessary within the Scope of Relevant Purposes by Persons Under Confidentiality Obligation or Authorised Institutions and Organisations

Special categories of personal data of the data subject may be processed by persons under the obligation of confidentiality or authorised institutions and organisations, if necessary for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, and the planning, management and financing of health services.

PERSONAL DATA PROTECTION AND PROCESSING POLICY OF ANADOLU EFES

(vii) Processing for the Fulfilment of Legal Obligations Regarding Employment, Occupational Health and Safety, Social Security, Social Services and Social Assistance

In the event that it is mandatory to fulfil legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance, the special categories of personal data of the data subject may be processed.

(viii) Processing Regarding Foundations, Associations and Other Non-Profit Organisations or Formations Established for Political, Philosophical, Religious or Trade Union Purposes

Foundations, associations and other non-profit organisations or formations established for political, philosophical, religious or trade union purposes; provided that they comply with the legislation to which they are subject and their purposes, are limited to their fields of activity and are not disclosed to third parties; may process special categories of personal data of the data subject for their current or former members and members or persons who are in regular contact with these organisations and formations.

Transfer of Special Categories of Personal Data to Third Parties Residing Abroad

The transfer of special categories of personal data abroad by our Company will be carried out in accordance with Article 9 of the Law and the principles set out in this Policy, by taking technical and administrative measures in the direction described below:

(i) Transfer Based on the Adequacy Decision Made on the Relevant Country, International Organisation or Sectors within the Country

Personal data may be transferred abroad by the Company if one of the conditions specified in Articles 5 and 6 of the Law exists and if there is an adequacy decision issued by the Board regarding the country, international organisation or sectors within the country to which the transfer will be made.

The adequacy decision is issued by the Board and published in the Official Gazette. The Board may also take the opinion of relevant institutions and organisations if necessary. The adequacy decision is evaluated every four years at the latest. The Board may modify, suspend or revoke the adequacy decision with prospective effect as a result of the assessment or in other cases it deems necessary.

(ii) Transfer Based on Appropriate Safeguards

In the absence of an adequacy decision, personal data may be transferred abroad by the Company if one of the following appropriate safeguards is provided by the parties, provided that one of the personal data processing conditions specified in Articles 5 and 6 of the Law exists and the person concerned has the opportunity to exercise his rights and apply for effective legal remedies in the country where the transfer will be made:

- **Special Transfer Reason for Public Institutions and Organisations or Professional Organisations of Public Nature:** Existence of an agreement that is not in the nature of an international contract between public institutions and organisations or international organisations abroad and public institutions and organisations or professional organisations in the nature of a public institution in Turkey and the Board's permission for the transfer.

PERSONAL DATA PROTECTION AND PROCESSING

POLICY OF ANADOLU EFES

- **Binding Corporate Rules:** Existence of binding corporate rules approved by the Board and containing provisions on the protection of personal data, which the companies within the group of undertakings engaged in joint economic activities are obliged to comply with.
- **Standard Contracts:** Existence of a standard contract announced by the Board, including data categories, purposes of data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data recipient, additional measures taken for special categories of personal data, and notifying the Board about this standard contract within the legal periods.
- **Letter of Undertaking:** Existence of a written letter of undertaking containing provisions to ensure adequate protection and authorisation of the transfer by the Board.

(iii) Transfer Based on Incidental Circumstances

Personal data may be transferred abroad by the Company in the absence of an adequacy decision and if one of the appropriate assurances cannot be provided, provided that it is incidental, in the presence of one of the following cases:

- **Informed Special Explicit Consent for Possible Risks:** The explicit consent of the data subject to the transfer, provided that the data subject is informed about the possible risks.
- **Execution of the Contract and Implementation of Pre-Contractual Measures:** The transfer is mandatory for the performance of a contract between the data subject and the data controller or for the implementation of pre-contractual measures taken upon the request of the data subject.
- **Third Party Contracts for the Benefit of the Data Subject:** The transfer is necessary for the conclusion or performance of a contract between the controller and another natural or legal person for the benefit of the data subject.
- **Necessity for a Superior Public Interest:** The transfer is necessary for a superior public interest.
- **Establishment, Exercise or Protection of Right:** The transfer of personal data is mandatory for the establishment, exercise or protection of a right.
- **Actual Impossibility:** It is mandatory to transfer personal data for the protection of the life or physical integrity of the person or another person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid.
- **Transfer from Public Registers:** Transfer from a registry open to the public or persons with legitimate interest, provided that the conditions required to access the registry in the relevant legislation are met and the person with legitimate interest requests it.

6.4 Categories of the Parties to Whom Personal Data Are Transferred

Efes may transfer the personal data of data subjects (see Article 5.2) to the following groups of people for the specified purposes within the scope of the Policy in accordance with the principles set forth in the Law and particularly articles 8 and 9 of the Law:

PERSONAL DATA PROTECTION AND PROCESSING POLICY OF ANADOLU EFES

- The corporations within the structure of Anadolu Group of Companies,
- Efes Pazarlama ve Dağıtım Ticaret A.Ş.,
- Suppliers of Efes,
- Affiliates of Efes,
- Business partners of Efes,
- Authorized public institutions and organizations and authorized private persons,
- Other third parties in compliance with the conditions of data transfer.

The scope of the persons to whom personal data are transferred and the probable data transfer purposes are outlined below.

THE PERSONS TO WHOM DATA MAY BE TRANSFERRED	DESCRIPTION	PURPOSE OF DATA TRANSFER
Business partner	The parties with whom Efes establishes a business partnership for the performance of business activities	
Supplier	The parties who provide services with Efes based on an agreement in compliance with the orders and instructions of Efes within the scope of performance of its business activities	
Affiliates	The corporations in which Efes is a shareholder	
The corporations within the structure of Anadolu Group of Companies	All corporations forming Anadolu Group of Companies	
Legally authorized public institutions and organizations	Authorized public institutions and organizations which are authorized to obtain the information and documents of the Company according to the provisions of the applicable legislation	
Legally authorized private persons	Authorized private persons who are authorized to obtain information and documents from the Company according to the provisions of the applicable legislation	

7. Definitions

PERSONAL DATA PROTECTION AND PROCESSING POLICY OF ANADOLU EFES

The definitions of the terms used in the Policy are provided below:

Explicit consent:	Freely given, specific and informed consent,
Anonymization:	Rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data,
Directive on the processing of personal health data:	Directive on the Processing and Privacy of Personal Health Data as published in the 20.10.2016 dated and 29863 issue numbered Official Gazette.
Personal health data:	All kinds of health data related to an identified or identifiable real person.
Personal data:	Any information relating to an identified or identifiable natural person.
Data subject:	(Natural person concerned) The natural person, whose personal data are processed.
Processing of Personal data:	Any operation which is performed on personal data, wholly or partially by automated means or non-automated means which provided that form part of a data filing system, such as collection, recording, storage, protection, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization, preventing the use thereof.
Law	The 24.03.2016 dated and 6698 numbered Personal Data Protection Law as published in the 07.04.2016 dated and 29677 issue numbered Official Gazette.
Board	The Personal Data Protection Board.
Authority	The Personal Data Protection Authority.
Sensitive personal data	Data on race, ethnic origin, political view, philosophical belief, religion, sect or other beliefs, clothing, membership in foundations, associations or unions, health, sexual life, criminal conviction and security measures as well as biometric and genetic data.
Policy	Personal Data Protection and Processing Policy of Anadolu Efes Biracılık ve Malt Sanayii Anonim Şirketi.
Efes/Company	Anadolu Efes Biracılık ve Malt Sanayii Anonim Şirketi.
Business partners of Efes	The parties with whom Efes establishes a business partnership for various purposes at the time of performance of its business activities.
Suppliers of Efes	The parties which provide services with Efes based on an agreement.
Corporations of Anadolu Group/Group Companies	The corporations within the structure of AG ANADOLU GRUBU HOLDİNG A.Ş.

PERSONAL DATA PROTECTION AND PROCESSING POLICY OF ANADOLU EFES

Turkish Criminal Code	The 26.09.2004 dated and 5237 numbered Turkish Criminal Code as published in the 12.10.2004 dated and 25611 issue numbered Official Gazette.
Data processor	The natural or legal person who processes personal data on behalf of the data controller upon its authorization.
Data controller	The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data filing system.