

Personal Data Protection Policy

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December 17, 2019	Information Security and Risk Management	V01	First Publication	Board of Management

1. PERSONAL DATA PROTECTION POLICY

Softtech Software Technologies Research Development and Marketing Trade Inc. As the management, we attach great importance to personal data privacy and confidentiality within our organization. To protect personal data, taking the necessary security means and implementing the necessary checks is our primary objective. Especially the Management of Softtech Software Technologies Research Development and Marketing Trade Inc. and all Softtech employees are responsible for setting and implementing the appropriate security measures in this regard.

Among the most critical steps in personal data protection is the identification of personal data that Softtech receives as personal data in written, printed, or electronic form for various purposes and via different channels, as well as the implementation of the appropriate checks in this regard, preparation of secure environments needed to store such data, and most importantly, making sure that only a restricted number of and authorized people can access this data.

On top of the technical improvements necessary to handle the risks that personal data may encounter, it is required to establish a governance system where business processes and procedures are developed, improve this system continually, and keep it up-to-date.

Personal Data Protection Policy is created within this scope as one of the cornerstones of the governance system established to protect personal data. To strengthen this policy and increase its dynamism with business processes, the Regulation on the Protection and Management of Personal Data is being developed.

As the Management team of Softtech Software Technologies Research Development and Marketing Trade Inc, our primary aim is to keep our service network and business processes rapidly evolving with today's technology reliable, legal, and transparent with this governance system build.

As part of these efforts, we would like to remind Softtech employees of the importance of fully respecting and acting per the business processes as well as policy and procedures created to ensure the privacy and security of personal data.

2. VALIDITY AND REVISION

The policy takes effect on the date it is published on Softtech's intranet portal after its approval by the Board of Management. The policy is revised at least once a year per the provisions of the applicable law as well as Softtech's needs.