

FORD OTOMOTİV SANAYİ ANONİM ŞİRKETİ
PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA WITHIN THE SCOPE
OF THE BİLGİ, İLETİŞİM, GELİŞİM 2021
(“Privacy Policy”)

Ford Otomotiv Sanayi Anonim Şirketi (“**Ford Otosan**” or “**Company**”) attributes great importance to the secure and transparent processing of your personal data in conformity with the law and good faith. This Privacy Policy (“**Policy**”) is prepared for the objective of explaining how and for which purposes data relating to you will be processed and how you can manage your rights.

Below, you will find an explanation of general principles for the processing of personal data by Ford Otosan, the purposes for which your personal data is processed and the rights that you have concerning your personal data under the activity of Bilgi, İletişim, Gelişim 2021 (“**BIG 2021**”) carried out by Ford Otosan.

General Information

While, being an entity located in the Republic of Turkey, Ford Otosan shall comply with the provisions of the Law No. 6698 on the Protection of Personal Data (“**Law No. 6698**”) and the European General Data Protection Regulation (“**GDPR**”) as far as these laws apply for the processing of personal data by Ford Otosan.

Data Controller:

Ford Otomotiv Sanayi Anonim Şirketi
Akpınar Mahallesi, Hasan Basri Cad. No:2, 34885 Sancaktepe, İstanbul, Turkey
Company Registry No: 73232

Representative (Art. 27 para. 1 GDPR):

JURCOM GRC SERVICES B.V.
Willemsweg 94 6531 DN Nijmegen, Netherlands
gdprrep@ford.com.tr

Data Protection Officer of Ford Otosan:

You may approach the Data Protection Officer at dpo@ford.com.tr or by addressing a letter to the “Data Protection Officer” at the address of the Data Controller.

What is Personal Data?

“**Personal Data**” means any information relating to an identified or identifiable individual (a data subject) in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

How do we collect Personal Data?

If you wish to attend the activity of BIG 2021 carried out by Ford Otosan via online platform, Ford Otosan may collect and process Personal Data required for the organization of the BIG 2021 and operation of this online platform.

Which Personal Data do we collect?

We may collect information relating to the activity of BIG 2021 such as identity information (name-surname), contact information (e-mail address), work information (workplace and position), interests on activities carried out during BIG 2021, processing security information (username and password) and visual and audio records (video footages recorded during the event). We do not process sensitive Personal Data of special categories, as well as any biometric personal data.

For Which Purposes Is Your Personal Data Processed?

The purposes of processing Personal Data within the scope of BIG 2021 activity are listed below:

Your participation to BIG 2021 as a guest

Your identity information (name-surname), contact information (e-mail address), work information (workplace and position), interests on activities carried out during BIG 2021, processing security information (username and password) and visual and audio records (video footages recorded during the event) are processed for the purposes stated below in order to ensure your participation as a guest to BIG 2021:

- to provide your entrance to BIG 2021 online platform as guest with your password
- to ensure that you benefit from the online services stated below within the scope of BIG 2021 activity
 - o Visiting stands set up by Ford Otosan suppliers, Ford Otosan departments and universities
 - o Exchanging information and conducting communication activities with the stand owners
 - o Attending the speeches of the related speakers at BIG 2021 activity.
- to create an agenda and an event timeline following the determination and analysis of your interests on activities carried out during BIG 2021 and making adjustments on the intensity of internet usage of BIG 2021 platform which the activities will be carried out online.

Your participation to BIG 2021 as a stand owner

Your identity information (name-surname), contact information (e-mail address), work information (workplace and position), processing security information (username and password) and visual and audio records (video footages recorded during the event) are processed for the purposes stated below to ensure your participation as a stand owner to BIG 2021.

- to provide your entrance to BIG 2021 online platform as a stand owner with your password
- to set up and organize stands for the guests who will visit such stands online during BIG 2021 activity
- to provide services as a stand owner, exchange information and conduct communication activities with the guests within the scope of BIG 2021 activity.

Your participation to BIG 2021 as a speaker

Your identity information (name-surname), contact information (e-mail address), work information (workplace and position), processing security information (username and password) and visual and audio records (video footages recorded during the event) are processed for the purposes stated below to ensure your participation as a speaker to BIG 2021.

- to provide your entrance to BIG 2021 online platform as a speaker with your password

- to give speech, exchange information and conduct communication activities with the guests within the scope of BIG 2021 activity.

Compliance to legislation and management

All the Personal Data stated above may be processed regarding Ford Otosan's management and legislation compliance activities regarding the purposes stated below;

- to store the Personal Data collected within the scope of BIG 2021 activity in order for the fulfilment of this activity,
- to conduct the information security process of BIG 2021 platform,
- to follow up legal matters and perform our right of defence if necessary.

The following types of processing Personal Data are applied: collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission or transfer, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

For the detailed information on the purposes of processing your personal data by our Company, you can access the Ford Otomotiv Sanayi Anonim Şirketi Policy of Personal Data Protection and Processing, which has been shared with the public at www.fordotosan.com.tr. The aforementioned Policy on the Processing and Protection of Personal Data shall be applied in conjunction with this Policy. However, to ensure observance of the GDPR in case of its applicability, provisions of this Policy have always priority.

Legal Basis for Processing Personal Data

Depending on the purposes of processing and the circumstances, in processing your Personal Data we may rely on the following legal bases in the priority of their order below:

- The processing is necessary in connection with any contractual relationship that you may enter into with us, including the organization of the BIG 2021 and operation of this online platform;
- The processing is required by applicable law;
- The processing is necessary to protect the vital interests of any individual;
- We have a legitimate interest in carrying out the processing for the purpose of managing, improving, operating or promoting our business and our relationship with you, assessing the quality of the services we provide, and the services our suppliers provide to us or on our behalf, developing new and improved products, services, and business strategies, conduct research, protect or defend our or another's rights or property, or to detect, prevent, or otherwise address fraud, security, safety, or privacy issues (If you like to receive detailed information on the legitimate interests on which we base our processing, please send us an e-mail to gdprrrep@ford.com.tr .); or
- We have obtained your explicit prior consent to the processing.

We refer to Art. 6 para. 1 (a), (b), (c), (d) and (f) GDPR.

Where May We Receive Your Personal Data From?

All the Personal Data processed with above mentioned purposes, are collected via online form which will be filled during the entrance to BIG 2021 online platform, via our agent who had contacted you electronically in order to ensure your participation as stand owners, via camera

systems which you will use online and during your attendance to BIG 2021 activity and/or directly from the individual physically or electronically and/or in writing or orally.

Who May Access Your Personal Data?

Ford Otosan processes the Personal Data alone or may give assignment to third parties to process your data. If we are involving data processors into the performance of our services and contractual obligations, we have entered into data processing agreements with them. Ford Otosan may transfer your Personal Data to the third parties stated below within the scope of this Policy:

- the cloud based platform provider company located abroad with the purpose of carrying out storage activities of the Personal Data in order for the fulfilment of BIG 2021 activity,
- the agencies located in Turkey with the purpose of ensuring your attendance to BIG 2021 activity as a stand owner,
- legally authorized public institutions and individuals / private institutions and individuals with the purpose of following up legal matters and performing our right of defence, if necessary.

Ford Otosan and some of its third parties stated above are located outside the EU, which have not been subject of an adequacy decision of the EU commission pursuant to Article 45 GDPR. Ford Otosan will ensure that the level of data protection guaranteed by the GDPR will be upheld by

- Concluding EU Standard Contractual Clauses in accordance with Art. 46 para. 2 (c) GDPR or

Further information may be obtained by e-mail to gdprrep@ford.com.tr .

How do we protect and store Personal Data

We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

- pseudonymisation and encryption of Personal Data;
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- the ability to restore the availability and access to Personal Data in a timely manner in the event of a physical or technical incident;
- a process for regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

In assessing the appropriate level of security account shall be taken in particular of the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data transmitted, stored or otherwise processed.

Consequences in case we may not collect your Personal Data

We need your Personal Data for the organization of the BIG 2021 and operation of this online platform in order to perform our contractual obligations with you. Without providing such Personal Data, we may not be able to provide services you are intending to receive within the scope of the BIG 2021.

Consent and withdrawal

Any consent is provided freely. If you give your consent, you have the right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. After your withdrawal we will stop processing your Personal Data, including storage, unless further data processing is legally permitted.

To withdraw your consent, please send us an e-mail to gdprrrep@ford.com.tr a letter to Akpınar Mahallesi, Hasan Basri Caddesi, No:2, 34885 Sancaktepe, İstanbul, Turkey.

Legitimate Interest and Right to Object

You may object to the processing of your Personal Data based on legitimate interests of Ford Otosan or third parties. Unless your objection is directed solely against direct marketing by Ford Otosan, you have to explain your special situation, which makes the processing of your Personal Data based on legitimate interests unacceptable for you.

To object, please send us an e-mail to gdprrrep@ford.com.tr or a letter to Akpınar Mahallesi, Hasan Basri Caddesi, No:2, 34885 Sancaktepe, İstanbul, Turkey.

Retention

We only keep your personal information in identifiable form for as long as one of the following applies:

- Your information is reasonably required in order to satisfy the purpose for which you submitted or we collected the information;
- Your information is reasonably required in order to protect and defend our rights or property (this will generally be the length of the relevant limitation period in your jurisdiction); or
- We are otherwise required to keep your information by applicable laws or regulations.

Where information is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our retention policies, please send us an e-mail to gdprrrep@ford.com.tr

Your rights related to data privacy

You have the right to request access to and rectification or erasure of your Personal Data, or restriction of their processing. Furthermore, you have the right to request data portability. If you are situated in the EU, you have the right to file a complaint to the relevant data protection authority.

If you have questions or concerns regarding our use of your information, or would like to exercise any of your rights, please send us an e-mail to gdprrrep@ford.com.tr or a letter to Akpınar Mahallesi, Hasan Basri Caddesi, No:2, 34885 Sancaktepe, İstanbul, Turkey.

Updates to this Privacy Policy

We may modify or update this information from time to time. Please check www.fordtrucks.com.tr/en/connectruck-privacy-policy for the actual version of the data protection notice.

