

EMAAR GROUP POLICY ON DEMOLITION OF PERSONAL DATA

1. Objective

The objective of this Demolition Policy (“Demolition Policy”) is to perform methods and responsibilities on deletion, demolition and anonymization of personal data in Emaar Group in compliance with legislation on protection of related personal data and Emaar Group's Policy on Protection of Personal Data, **particularly**, 6698 numbered Code on Protection of Personal Data (“CPPD”), Directive on deletion, demolition and anonymization of personal data (“Directive”).

2. Scope of Demolition Policy

Grounds and methods to be followed in preparation for anonymization, deletion or demolition of personal data are approached within the scope of this policy.

3. Definition and concepts

- a) **Demolition refers to:** process of deletion, demolition and anonymization of personal data in a manner that those cannot be utilized afterwards.
- b) **Deletion refers to:** the process of making personal data processed by automatic means partially or wholly or maintained in digital environment in a manner that those cannot be used or accessed again by related users.
- c) **Related user refers to:** the users processing personal data within the direction of power and instruction taken from Emaar Group or within the organization of Emaar Group apart from the person or unit responsible for storage, protection and backup of personal data technically.

4. Method for Demolition of Personal Data

The method of **deletion** was adopted for demolition of personal data held in the body of Emaar Group among the demolition methods within the scope of directive.

An access power and control matrix will be established by Emaar Group [IT / Department of Information Technologies] regarding the personal data held in the body of Emaar Group for

deletion procedures, and the people having the power of access and control of each personal data in question will be determined ("related user/s").

5. Basic principles on Demolition of Personal Data

The personal data held in the body of Emaar Group shall be deleted in 3 months at the latest after disappearing of the reason for processing each personal data. In any case, Emaar Group IT / Department of Information Technologies shall scan all personal data held in the body of Emaar Group in yearly periods and personal data that are required to have been deleted but mistakenly conserved shall immediately be deleted.

The process to be followed in deletion of personal data held in the body of Emaar Group is as follows:

- a) Determination of the personal data to be subjected to deletion;
- b) Determination of related users for each personal data by using access power and control matrix;
- c) Determination of powers and methods of related users such as access, return and reusage; and
- d) Closing and removal of powers and methods of related users such as access, return and reusage within the scope of personal data.

Emaar Group IT / Information Technologies Department shall take all kinds of technical and administrative precautions to make deleted personal data inaccessible and not usable again by related user.

Emaar Group IT / Information Technologies Department may delete or demolish personal data upon disappear of the reasons for processing data referring to its own decision or upon request of personal data owner, despite the fact that those data are processed complying with the provisions of related code.

All kinds of procedures conducted in association with deletion, demolition or anonymization of personal data is recorded by Emaar Group IT / Information Technologies Department and aforementioned records are withheld for at least three years excluding other legal liabilities.

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6. Changes to be made on Demolition Policy

Emaar Group may make alterations in this Demolition Policy from time to time to the extent its activities require and required by law. Aforementioned alterations will gain validity upon sharing altered Demolition Policy text on “<http://www.emaarsquaremall.com>”, “<http://www.emaarakvaryum.com>” and “<http://www.emaar.com.tr>”. Moreover, customers, employees and authorities shall be informed on the alterations to be made by means of electronic mail.