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EMAAR GROUP POLICY ON PROTECTION OF SPECIAL QUALITY PERSONAL DATA

1. Objective

- a. Hereby this **Policy on Protection of Special Quality Personal Data (“Policy”)**, sets forth the approach of Emaar Libadiye Gayrimenkul Geliştirme Co.Inc., Emaar Properties Gayrimenkul Geliştirme Co. Inc., Emaar Gayrimenkul Geliştirme Co. Inc., Emaar Properties PJSC, being group companies and contact offices of Emaar Group (“**Emaar Group**”) on protection of Special Quality Personal Data and;
 - i. **Personal data refers to:** all kinds of information on real persons, identified or can be identified;
 - ii. **Special Quality Personal Data refers to:** race, ethnic origin, political opinion, philosophical belief, religion, communion or other beliefs, appearance and dress, association, foundation or union membership, health, sexual life, criminal convictions and security measures etc. data and biometric and genetics data of people;
 - iii. **Processing Special Quality Personal Data refers to:** all kinds of transactions conducted on Special Quality Personal Data partially or completely such as acquisition, record, storage, maintain, alteration, re-arrangement, disclosure, transfer, take-over, making acquirable, classification or prevention of usage by automatic or non-automatic means, provided that being a part of any data recording system;
 - iv. **Data Controller refers to:** any legal or real person determining personal data processing tools and purposes and responsible for installation and management of data recording system or any Emaar Group company;
 - v. **Data Processor refers to:** any Emaar Group company or any real or legal person processing personal data basing on the authority granted by and on behalf of Emaar Group company;
 - vi. **Data Owner refers to:** real person being subject matter of personal data;

- vii. **Data Recording System refers to:** recoding system processing personal data utilized by any Emaar Group company by configuring personal data according to the criteria determined;
 - viii. **Board refers to:** Board of Protection of Personal Data;
 - ix. **Institute refers to:** Institute of Protection of Personal Data;
 - x. **Code refers to:** Code on Personal Data Protection which was published in the Official Gazette with 29677 number on April 7, 2016;
 - xi. **Verdict refers to:** the verdict of Board related to measures required to be taken by data controller during processing of Special Quality Personal Data pursuant to 31.01.218 dated and 2018/10 numbered Code Article 6 (4) and 22 (1).
- b. Policy pursues the goal of determination of the systems directed on security of related data during processing Special Quality Personal Data collected by Emaar Group.

2. In terms of employees during processing

Data policy to be implemented by Emaar Group during processing of Special Quality Personal Data in terms of Employees (“**Employees**”) is as follows:

- a. Providing trainings on security of Personal Data to employees two times in a year within the scope of related legislation;
- b. Entering into confidentiality agreement with employees;
- c. Clear definition of scope and period of powers of employees;
- d. Controlling powers of employees periodically by Emaar Group;
- e. In case of changing position or ceasing employment, release of authorities immediately by Emaar Group.

3. In terms of place of storage

- a. Data policy to be implemented by Emaar Group **in terms of electronic environments** where Special Quality Personal Data is processed, stored and/or accessed is as in the following:

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- i. **Maintaining related data through cryptographic methods and keeping cryptographic keys in safe and different areas;**
 - ii. **Logging transaction records of motions actualized on related data in safe manner;**
 - iii. **Regular controls on security updates of environments including related data, performance of security tests two times in a year regularly and recording test results;**
 - iv. **Authorizing users concerning the data accessed by means of a software, performance of security tests associated with these software two times in a year regularly and recording test results;**
 - v. **Providing two-stage verification system related to the data remote accessed.**
- b. Data policy system to be implemented by Emaar Group **in terms of physical environments** where Special Quality Personal Data is processed, stored and/or accessed is as in the following:
- i. Taking adequate safety precautions according to the property of physical environment;
 - ii. Preventing unauthorized entrance and exit to provide security of physical environment.

4. With regard to the Transfer

- a. Processing and transfer of Special Quality Personal Data is only possible with explicit consent of related people and can only be actualized in case of following conditions, if explicit consent is not provided:
 - i. Personal Data not associated with health and sexual life can be processed without seeking for explicit consent of related person in the events foreseen in codes.
 - ii. Personal Data on health and sexual life can only be processed by authorized institutions and organizations or people under confidential obligation without requiring explicit consent of the concerned people for purposes of protection of public health, preventive medicine, medical

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diagnosis, carrying out treatment and care services, planning and management of financing and health services.

- b. If Special Quality Personal Data will be transferred within the body of Emaar Group, the data policy to be implemented is as in the following:
 - i. If related data will be transferred via electronic mail, transfer shall be carried out by using registered electronic mail or corporate electronic mail cryptically;
 - ii. If related data will be transferred via flash memory, CD, DVD etc. VPN shall be installed between servers or sFTP method shall be used;
 - iii. If related data shall be transferred in printed form, necessary precautions shall be taken against steal, loss or unauthorized observation and the document shall be sent with "confidential documents" format.