

EMAAR GROUP POLICY ON PROTECTION OF PERSONAL DATA

1. Objective of Policy on Personal Data Protection

- a. Hereby this **Policy on Protection of 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 personal data and;
- i. **Personal data refers to:** all kinds of information on real persons, identified or can be identified;
 - ii. **Processing Personal Data refers to:** all kinds of transactions conducted on 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;
 - iii. **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 data relating to security measures and biometric and genetics data of people;
 - 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;

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- 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.
- b. Policy provides details on Personal Data Collected by Emaar Group in terms of
- 1. Contents and categories;
 - 2. Manner of utilization;
 - 3. People and institutions at home and abroad with which data may be shared;
 - 4. Manner of processing personal data;
 - 5. Conditions of maintaining personal data;
 - 6. Rights of Personal Data owners;
 - 7. Measures taken for the Protection of Personal Data;

and aims at informing Personal Data owners on these issues within the context of the activities of Emaar Group.

2. Personal Data collected by Emaar Group and Purpose of Processing These

- a. The objective of Emaar Group is the whole of the purposes determined in registries in which Emaar Group companies are registered.
- b. Emaar Group may collect and process the following information, including but not limited to the followings, belong to its customers, employees and authorities in association with its objective:
 - i. Identity card, driver's license, passport, residency certificate, birth certificate, marriage certificate etc. identity certificates and copies of those;
 - ii. Health reports, blood type certificate etc. health information;
 - iii. Photograph, video, finger print etc. biometric and genetic data;
 - iv. Phone number, e-mail address;
 - v. Various information on penal conviction and security measures, including criminal record;
 - vi. Any official documents certifying their signatures;

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c. Purpose and ground of Emaar Group's **Personal Data processing is summarized as follows** and Emaar Group **commits that it will not go beyond the aforementioned objective and ground in terms of Personal Data processing;**

i. **The objective of personal data collection is provided in the following:**

1. **For commercial partners:**

a. **Without prejudice to the exceptions in Code on Protection of Personal Data (CPPD) art. 5(2)(c),**

- i. **Using the data obtained beforehand in subsequent transactions;**
- ii. **Resolution of Commercial Disputes;**
- iii. **Saving time;**
- iv. **Transmitting data to abroad or domestic servers with the aim of providing data security;**
- v. **Data backup;**
- vi. **External and internal audit, accounting, tax counselling;**
- vii. **Intragroup data transfer;**
- viii. **BT, translation, legal consultancy services;**
- ix. **Forward planning;**
- x. **Keeping statistics;**
- xi. **Follow-up of previous studies;**
- xii. **Ensuring order and control, management and harmony in work place;**
- xiii. **Archiving data acquired from office activities;**
- xiv. **Facilitating the operation of recruitment process.**

3. Data Collection Methods

a. Emaar Group **shall collect the personal data by means of the methods specified in the following:**

- i. **E-mail;**
- ii. **Fax;**

- iii. **Phone;**
- iv. **Mail;**
- v. **Courier;**
- vi. **Hand delivery.**

4. Permission for Processing and Transfer

a. Domestic Processing and Transfer:

i. Emaar Group's processing personal data of related people at home and transfer of these to real or legal third parties 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:

1. Explicitly foreseen in codes;
2. Obligated for protection of his/her or others' life or bodily integrity of any person who cannot grant consent due to actual impossibility or whose consent is not valid legally;
3. Provided that it is directly related with drawing up or execution of a contract, necessity of processing Personal Data belong to the parties of the contract;
4. Obligated for the performance of legal liabilities of Emaar Group or other Data Controller;
5. Made public by related person;
6. Data processing's being obligated for establishment, utilization or protection of a right;
7. Data processing's being obligated for legitimate interests of Emaar Group or other Data Controller provided that it does no harm to fundamental rights and freedoms of related person.

b. Processing and Transfer of Special Quality Personal Data:

i. 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:

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1. 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.
2. 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 diagnosis, carrying out treatment and care services, planning and management of financing and health services.

c. Processing and Transfer Abroad:

- i. In associated with the partners and employees of Emaar Group, domestic processing of related personal data and transfer of these to real or legal third parties 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:
 1. In case of presence of the provisions specified in 4.a and 4.b above and in addition to these;
 2. Presence of adequate protection in the foreign country to which Personal Data will be transferred;
 - a. as determined and declared by Board;
 - b. In the event that adequate protection is not available, data controllers in Turkey and related foreign country shall undertake sufficient protection in writing and Council shall grant permission.
- ii. Furthermore, Personal Data can be transferred to foreign countries, without prejudice to the provisions of international convention, in the cases when interest of related person or country will severely get harmed, with the permission of the Board by receiving opinion of related public institution or organization.

5. Security of Personal Data

- a. Emaar Group shall provide security of Personal Data to actualize following purposes and take all kinds of technical and administrative measures required for fulfilling convenient security level to achieve these purposes:
 - i. to prevent processing of Personal Data contrary to law;
 - ii. to prevent illegal access to Personal Data;
 - iii. to provide conservation of Personal Data.
- b. Emaar Group companies are jointly responsible for taking measures specified in 5.a together with Data Processors, in the event that personal data is processed by any other legal or real third party on behalf of group companies.
- c. Emaar Group companies has to carry out necessary audits or have these audits done within its institution or organization with the purpose of ensuring performance of provisions of Code.
- d. Data Controllers and Data Processors cannot disclose the Personal Data they are informed of to others contrary to law and cannot use these beyond the purpose of processing. This obligation also continues after resignation.
- e. In the event that processed Personal Data is acquired by others in illegal manners, Emaar Group companies shall notify this issue to concerned party and Board in the soonest time. If deemed necessary, Board may declare this issue on its website or by any other means considered appropriate.

6. Rights Associated with Personal Data

- a. Everybody has the following rights related to them by applying to Emaar Group companies.
 - i. Learning whether their Personal Data is processed or not;
 - ii. Requesting information on it if their Personal Data is processed;
 - iii. Learning the purpose of processing of their Personal Data and whether these data are used for the purpose or not;
 - iv. Learning about the third parties at home or abroad to whom their Personal Data is transferred;

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- v. Requesting correction in case of misprocessing or underprocessing of Personal Data;
 - vi. Requesting deletion or demolition of Personal Data within the scope of 7th article of the Code;
 - vii. 6.a.v And requesting notification of the procedures conducted pursuant to 6.a.vi section to the third parties to whom Personal Data is transferred;
 - viii. Objecting to emergence of result against concerned person by means of analysing processed Personal Data exclusively through automatic systems, and
 - ix. Requesting compensation of damages, in case of suffering from any loss because of illegal processing of Personal Data.
- b. It is required for usage of aforementioned rights that the request in question regarding Personal Data shall be submitted to following communications in writing together with the information that provide identification of related person:
- i. e-mail to: “info@emaarsquaremall.com”; “info@emaarakvaryum.com” or “info@emaar.com.tr”;
 - ii. Mail to: “*Emaar Square Ofis Kulesi, Ünalán Mah. Libadiye Cad. No:82-F Kat:1 Üsküdar, İstanbul*”:

7. Measures for the Protection of Personal Data and Conserving these Correctly and Currently

- a. Emaar Group preserves Personal Data in correct and current manner by means of the methods specified in the following:
- b. Emaar Group conserves Personal Data in correct and current manner within the scope of following methods:
 - i. Daily backups;
 - ii. Firewall;
 - iii. Anti-virus programs; and,
 - iv. administrative limitations.

8. Alterations to be conducted in the Policy on Personal Data Protection

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- a. Emaar Group may make alterations in this Policy from time to time to the extent its activities require and required by law. Aforementioned alterations will gain validity upon sharing altered 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.