

Scope: Provision of foreign trade services, customs clearance, warehousing, sea, road, air, and intermodal (rail) logistics operations, as well as inland and international delivery services.

1. Introduction

This Personal Data Protection Policy (“Policy”), forming part of Apron Global Logistics' Code of Ethics, is designed to establish a compliance framework and guide all activities related to the lawful processing and protection of personal data. The goal is to ensure that all processing operations are conducted with lawfulness, fairness, and transparency.

This Policy applies to all employees, managers, and—where relevant—business partners, suppliers, and service providers acting on behalf of the company.

2. Definitions

- **Explicit Consent:** Informed and voluntary agreement regarding a specific matter.
- **Anonymization:** Rendering data unidentifiable even when combined with other datasets.
- **Data Subject:** The individual whose personal data is processed (e.g., customers, visitors, employees).
- **Business Partners:** Vendors, freight forwarders, customs brokers, subcontractors, consultants.
- **Personal Data:** Any information related to an identifiable individual.
- **Processing:** Any operation on personal data—collection, storage, transfer, erasure, etc.
- **Legislation:** Applicable data protection laws, including Law No. 6698 on the Protection of Personal Data.
- **Special Categories of Data:** Data related to race, health, beliefs, biometrics, sexual life, etc.
- **VERBIS:** Data Controllers' Registry System.
- **Data Controller:** Entity determining the processing purposes and methods.
- **Data Processor:** Entity processing data on behalf of the controller.

3. Core Principles

Violating this policy may result in legal, administrative, and reputational consequences. Apron Global Logistics is committed to full compliance with data protection legislation and ethical data governance.

4. Policy Implementation

- **Lawfulness and Fairness:** Data must be processed in good faith and in compliance with the law.
- **Accuracy and Currency:** Systems must be in place to ensure personal data remains accurate and up-to-date.
- **Purpose Limitation:** Data must be processed for specific, explicit, and legitimate purposes.
- **Data Minimization:** Only data necessary for the intended purpose should be collected and processed.
- **Retention Limitation:** Data should be retained only for the required legal period or purpose and deleted/anonymized thereafter.

5. Conditions for Processing

Processing must be based on legal grounds provided by legislation. Sensitive data requires explicit consent and enhanced protection measures.

6. Data Transfers

Data may be transferred to third parties only with a valid legal basis, purpose alignment, and appropriate safeguards in place.

7. Obligations and Compliance

Data Controllers must register with VERBIS and update records accordingly. The Legal & Compliance Unit oversees compliance and regulatory reporting obligations.

8. Conclusion

This policy reaffirms Apron Global Logistics' commitment to protecting personal data in line with applicable legal frameworks and corporate responsibility. It is reviewed annually and revised as needed to ensure ongoing compliance and alignment with best practices.

APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

Apron Global Logistics Foreign Trade Ltd. Co.



PREPARED AND APPROVED BY APRON GLOBAL LOGISTICS BOARD OF DIRECTORS