INFORMATION ON PROTECTION AND PROCESSING OF PERSONAL DATA

Data Controller:MEY ICKI SAN. VE TIC. A.S.
(shall, hereinafter, be briefly referred to as "MEY")
Buyukdere Cad., Bahar Sok., No:13 River Plaza K:25-29 34394
Sisli Istanbul

Thanks for your interest in our Company and products. We, at **Mey**, respect your personal data that we manage while maintaining our operations, and we show the maximum level of sensitivity to security of personal data. We attach importance to protection of fundamental rights and freedoms, in principal the right of privacy, while processing any personal data, and thereby, we hereby provide information for you on methods for collecting personal data, the purpose(s) thereof and the legal grounds therefor as well as the mutual rights and obligations as per the provisions prescribed under the Law Nr. 6698 on Protection of Personal Data ("LPPD").

MEY ICKI SAN. VE TIC. A.S. ("Mey") or Diageo Plc., the parent company thereof, as well as all affiliates thereof, in principal Mey Alkollu Ickiler San. Ve Tic. A.S., acting as the Data Controller, may obtain, record, retain, disclose or transmit your personal data to any third parties or international parties or in any other ways to the extent as permitted by the applicable regulations thereto, in accordance with the provisions prescribed under the LPPD and under the framework provided below.

Definition of Personal Data - Private Data:

Under the LPPD; **personal data** refers to any and all kinds of information of any identified or identifiable real person such as name-surname, TR ID Number, e-mail, address, date of birth, camera footage, etc.

Private data refers to any and all data of persons such as race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and clothes, membership to any association, foundation or union, health, sexual life, criminal capacity and security measures, as well as any and all biometric and genetic data of the same.

Collection and Processing of Personal Data, and Purposes of Processing:

Any of your personal data, which have been collected, may be processed by MEY in accordance with the basic principles, prescribed under the LPPD, as well as the terms and purposes for processing of any personal data as set out in sections 5 and 6 under the Law.

Your personal data may be collected verbally, in writing or electronically by automatic or nonautomatic means through the departments and offices of our Company, Diageo Plc., the parent company thereof, and all affiliates in principal Mey Alkollu Ickiler San. Ve Tic. A.S., as well as the website, social media channels, mobile applications and any trainings, seminars or organizations held by MEY, and any other similar means for the below-given more detailed purposes, which might change depending on the services provided by the training institution of our company (IWSA-International Wine & Spirits Academy, and the products and services provided by our company as well as the business operations of the same. Our Company carries out monitoring activities by security camera in its workplace, facilities and training institutions for the purpose of maintaining physical security, and thereby, entries and exits of our visitors are taken under record. Retrospective connection information of any beneficiaries of our Company's internet services are retained in accordance with the requirements prescribed under the law. Any of your personal data may be updated and processed as long as you keep utilizing the products and services, offered by our Company and our Affiliates, as well as the activities and services, carried out by IWSA, our Training institution.

Your personal data are processed for the below-given purposes:

- Performance of any and all processes, necessary to ensure that the trainings and services carried out by the training institution owned by MEY (IWSA) as well as the business operations of MEY comply with the applicable regulations and Internal Policies and Procedures, by the concerned departments of MEY, and conduct of the activities accordingly;
- Determination, planning and implementation of the business policies of MEY;
- Ensuring the legal and commercial security of MEY, the training institution owned by the same (IWSA), Diageo Plc., the parent company thereof, and all affiliates of the same, in principal Mey Alkollu Ickiler San. Ve Tic. A.S., as well as any real or legal persons, with whom/which MEY maintains its business relationship (any administrative operations carried out by MEY, ensuring physical security and inspections of any offices, workplaces, facilities and any other similar locations of MEY, evaluation of the customers of MEY and its affiliates, product vs. complaint management processes, reputation searching processes, effectiveness management, legal compliance process, internal and external audits, financial affairs, etc.);
- Planning and conduct of any and all kinds of human resources activities of MEY, and provision of support for such activities;
- Protection of the commercial standing and the credibility established by MEY, the training institution owned by the same (IWSA), Diageo Plc., the parent company of the same, and the affiliates of the same in principle Mey Alkollu Ickiler San. Ve Tic. A.S.

You may find further information on the purposes of processing of any of your personal data by MEY through "Policy of Mey for Protection and Processing of Personal Data" available on the official website <u>www.mey.com.tr</u>.

Transmission of Processed Personal Data:

Your personal data, which have been collected, may be transmitted to supervisory and regulatory authorities, concerned public institutions, professional organizations and any other similar organizations, and any persons or organizations permitted by the provisions under the Turkish Code of Commerce and the other applicable regulations, and also any legally authorized public and/or private legal persons to the extent that it is limited to the purpose as requested by the same in accordance with its legal authority, and Diageo Plc., the parent company of MEY, and all our affiliates including Mey Alkollu Ickiler San. Ve Tic. A.S., as well as our direct/indirect domestic/international subsidiaries, consultants, auditors and/or service providers under the related statutory provisions, in accordance with terms and purposes for processing of any personal data as set out in sections 8 and 9 under the Law for the purpose of performance of any and all processes, necessary to ensure that the trainings and services carried out by the training institution owned by MEY (IWSA) as well as the business operations of MEY comply with the applicable regulations and Internal Policies and Procedures, by the concerned departments of

MEY, and conduct of the activities accordingly; and determination, planning and implementation of the business policies of MEY; and Ensuring the legal and commercial security of MEY, the training institution owned by the same (IWSA), Diageo Plc., the parent company thereof, and all affiliates of the same, in principal Mey Alkollu Ickiler San. Ve Tic. A.S., as well as any real or legal persons, with whom/which MEY maintains its business relationship (any administrative operations carried out by MEY, ensuring physical security and inspections of any offices, workplaces, facilities and any other similar locations of MEY, evaluation of the customers of MEY and its affiliates, product vs. complaint management processes, reputation searching processes, effectiveness management, legal compliance process, internal and external audits, financial affairs, etc.); and planning and conduct of any and all kinds of human resources activities of MEY, and provision of support for such activities; and also protection of the commercial standing and the credibility established by MEY, the training institution owned by the same (IWSA), Diageo Plc., the parent company of the same, and the affiliates of the same including Mey Alkollu Ickiler San. Ve Tic. A.S.

Method for Collection of Personal Data, and Legal Reason(s) therefor:

Your personal data are collected through any and all kinds of verbal, written or electronic media in accordance with the above-given purposes in order to enable that our products, trainings and services are provided within the pre-determined legal framework, and accordingly, that our Company fulfills its any and all contractual and statutory liabilities accurately and perfectly. Your personal data, which have been collected for such legal reason(s), may be processed and transmitted in accordance with the terms and purposes for processing of any personal data, as set out in sections 5 and 6 under the LPPD, and for the purposes provided hereunder.

Cases Not Requiring Your Explicit Consent for Personal and/or Private Data:

As per paragraph 2 of section 5 under the LPPD; MEY is entitled to process any personal data (except for the ones in relation to health and sexual life) without obtaining the explicit consent in any cases where it is necessary to protect the life or bodily integrity of the concerned person or any other person, who may not grant her/his consent since it is actually impossible or the consent of whom is not recognized in legal terms; and where it is necessary to process any personal data of the parties to the agreement to the extent that it is directly associated with establishment or performance of the agreement; and where it is necessary for the data controller to fulfill its statutory obligation; and where any such data are already made public by the concerned Person; and where processing of any data is necessary for legitimate interests of the data controller to the extent that the fundamental rights and freedoms of the concerned person are not damaged.

Except for the cases prescribed under the applicable regulations and provided above, any of your personal data including your private data may not be processed unless you grant your explicit consent thereto. It is required to provide you with detailed information regarding the reason(s) for processing of your personal data before your explicit consent is obtained.

Data Security:

We attach importance to protection he confidentiality and security of all your personal information provided to us by you. Accordingly; we take any and all technical and administrative security measures to protect your personal data from unauthorized access, damage, loss or disclosure risks thereto.

Rights of Personal Data Owners provided under section 11 of LPPD:

In the event that you, as personal data owner, submit your request regarding your rights to our Company by means of the methods set out under this Information Text on Protection and Processing of Personal Data, our Company shall conclude any such request free of charge within maximum thirty days basing on the nature of the request. However; in case the Personal Data Protection Board stipulates collection of a charge, then, our Company shall collect the fee specified under the tariff as determined by our Company. Accordingly; personal data owners are entitled;

- to inquire whether their personal data have been processed, or not; and
- to ask for information regarding any such processed personal data; and
- to be informed about the purpose of processing of any such data, and also about the fact that whether such data have been used as appropriate to the purpose thereto; and
- to be informed about the 3rd parties to which any such data has been transmitted either domestically or internationally; and
- to ask for correction of any imperfect or inaccurate data, in case of any imperfect or inaccurate processing thereof, and to ask for providing information regarding any processes, performed for such purpose, to the 3rd parties to which any such personal data has been transmitted; and
- to ask for deletion of any such personal data if the reasons requiring processing of any such data have disappeared in spite of the fact that any such personal data have been processed in accordance with the provisions prescribed under the LPPD and the other applicable laws, and to ask for providing information of this situation to the 3rd parties; and
- to raise an objection against such outcome in case of emergence of an outcome that is to the detriment of you upon the analysis of any such processed personal data solely by any automatic systems; and also
- to claim for compensation of any and all damage and/or loss they might have incurred in case any such personal data have been processed in breach of the law.

You may send your request for exercising the above-mentioned rights of you to our Company either in writing or by means of the methods determined by the Personal Data Protection Board, in accordance with paragraph 1 of section 13 under the LPPD. The methods and procedures, through which you may send your application in writing to our Company accordingly under the scope of section 11 of the LPPD, are provided below.

In order to exercise your above-given rights; you may send your request, including any and all information required to identify you and your remarks regarding the right you wish to exercise among the rights provided under section 11 of the LPPD, either filling in and submitting the originally signed copy of the Information Form, available on www.mey.com.tr, in person to Buyukdere Cad., Bahar Sok., No:13 River Plaza K:25-29 34394 Sisli Istanbul along with any and all documents to identify you, or through the agency of the notary public or by any other means provided under the LPPD, or you may also send the respective form to meyicki@hs02.kep.tr after signing the same electronically.