

# **COREX HOLDING A.Ş.**

## **PERSONAL DATA PROTECTION AND PROCESSING POLICY**

## TABLE OF CONTENTS

|                                                                                                                                                       |          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| <b>SECTION 1 - INTRODUCTION .....</b>                                                                                                                 | <b>4</b> |
| 1.1. Scope .....                                                                                                                                      | 4        |
| 1.2. Implementation of the Policy and Applicable Legislation .....                                                                                    | 4        |
| 1.3. Entry into Force of the Policy .....                                                                                                             | 4        |
| <b>SECTION 2 - PRINCIPLES ADOPTED BY COREX REGARDING THE PROTECTION OF PERSONAL DATA ..</b>                                                           | <b>4</b> |
| 2.1. Ensuring the Security of Personal Data .....                                                                                                     | 4        |
| 2.2. Protection of Special Categories of Personal Data .....                                                                                          | 5        |
| 2.3. Raising Awareness of and Auditing Business Units Regarding the Protection and Processing of Personal Data .....                                  | 5        |
| <b>SECTION 3 - PRINCIPLES ADOPTED BY COREX REGARDING THE PROCESSING OF PERSONAL DATA ..</b>                                                           | <b>5</b> |
| 3.1. Processing Personal Data in Accordance with the Principles Set Forth in the Applicable Legislation .....                                         | 5        |
| 3.1.1. Lawful and Fair Processing .....                                                                                                               | 5        |
| 3.1.2. Ensuring that Personal Data are Accurate and, Where Necessary, Up to Date .....                                                                | 6        |
| 3.1.3. Processing for Specified, Explicit and Legitimate Purposes .....                                                                               | 6        |
| 3.1.4. Being Relevant, Limited and Proportionate to the Purposes for which they are Processed ....                                                    | 6        |
| 3.1.5. Retention for the Period Prescribed by the Applicable Legislation or Necessary for the Purpose for which the Personal Data are Processed ..... | 6        |
| 3.2. Conditions for Processing Personal Data .....                                                                                                    | 6        |
| 3.2.1. Conditions for Processing Personal Data under the KVKK .....                                                                                   | 6        |
| 3.2.2. Conditions for Processing Personal Data under the GDPR .....                                                                                   | 7        |
| 3.3. Processing of Special Categories of Personal Data .....                                                                                          | 7        |
| 3.4. Data Controller's Obligation to Inform Data Subjects .....                                                                                       | 8        |
| 3.5. Processing by CoreX Holding Companies of Personal Data Processed by CoreX .....                                                                  | 8        |
| 3.6. Transfer of Personal Data .....                                                                                                                  | 8        |
| 3.6.1. Transfer of Personal Data within Türkiye .....                                                                                                 | 8        |
| 3.6.2. Transfer of Personal Data Abroad .....                                                                                                         | 9        |

|                                                                                                        |           |
|--------------------------------------------------------------------------------------------------------|-----------|
| <i>Transfer Abroad under the KVKK .....</i>                                                            | <i>9</i>  |
| <i>Transfer under the GDPR .....</i>                                                                   | <i>10</i> |
| <b>SECTION 4 - CATEGORISATION AND PURPOSES OF PROCESSING OF PERSONAL DATA PROCESSED BY COREX .....</b> | <b>11</b> |
| <b>SECTION 5 - RETENTION AND DESTRUCTION OF PERSONAL DATA.....</b>                                     | <b>12</b> |
| <b>SECTION 6 - RIGHTS OF DATA SUBJECTS AND EXERCISE OF SUCH RIGHTS.....</b>                            | <b>12</b> |
| <b>6.1. Rights of Data Subjects .....</b>                                                              | <b>12</b> |
| <b>6.1.1. Rights of Data Subjects under the KVKK .....</b>                                             | <b>12</b> |
| <b>6.1.2. Rights of Data Subjects under the GDPR.....</b>                                              | <b>13</b> |
| <b>6.2. Exercise of Data Subjects' Rights .....</b>                                                    | <b>13</b> |
| <b>6.3. Company's Response to Data Subject Requests .....</b>                                          | <b>13</b> |
| <b>ANNEX 1 - DEFINITIONS.....</b>                                                                      | <b>15</b> |
| <b>ANNEX 2 - PURPOSES AND METHODS OF PROCESSING PERSONAL DATA .....</b>                                | <b>17</b> |
| <b>ANNEX 3 - DATA SUBJECTS .....</b>                                                                   | <b>21</b> |
| <b>ANNEX 4 - CATEGORIES OF PERSONAL DATA.....</b>                                                      | <b>24</b> |
| <b>ANNEX 5 - THIRD PARTIES TO WHOM PERSONAL DATA ARE TRANSFERRED AND PURPOSES OF TRANSFER.....</b>     | <b>27</b> |
| <b>ANNEX 6 - SECURITY OF PERSONAL DATA .....</b>                                                       | <b>28</b> |

## **SECTION 1 - INTRODUCTION**

### **1.1. Scope**

The processing and protection of personal data is one of the highest priorities of CoreX Holding A.Ş. ("CoreX", the "Company"), and the Company makes every effort to ensure compliance with the applicable national and international regulations to which it is subject. Within the scope of compliance with personal data protection legislation, this Personal Data Protection Group Policy (the "Policy") sets out CoreX's personal data processing activities, the principles and rules observed in the course of such activities, the measures taken to ensure data security, and the rights of data subjects. The purpose of this Policy is to provide an overview of CoreX's personal data processing activities and to inform data subjects.

### **1.2. Implementation of the Policy and Applicable Legislation**

CoreX carries out its personal data processing activities in compliance with Law No. 6698 on the Protection of Personal Data ("KVKK", the "Law") and, with respect to the activities to which it applies, the European Union General Data Protection Regulation ("GDPR") (the "Applicable Legislation"). Accordingly, the provisions of the Applicable Legislation shall primarily apply to the processing and protection of personal data. This Policy sets out the rules established by the Applicable Legislation by giving them concrete effect within the Company's practices.

### **1.3. Entry into Force of the Policy**

The Policy is published on [www.corexholding.com](http://www.corexholding.com) and shall be deemed to have entered into force upon its publication on the website.

## **SECTION 2 - PRINCIPLES ADOPTED BY COREX REGARDING THE PROTECTION OF PERSONAL DATA**

### **2.1. Ensuring the Security of Personal Data**

In accordance with Article 12 of the KVKK, CoreX takes the necessary administrative and technical measures and carries out or has carried out the necessary audits to prevent unlawful disclosure, access to, transfer of personal data or any other security deficiencies that may occur.

## **2.2. Protection of Special Categories of Personal Data**

The Law attaches particular importance to certain categories of personal data due to the possibility that their unlawful processing may result in individuals suffering harm or discrimination. Such data include data relating to race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other beliefs, appearance and clothing, membership of an association, foundation or trade union, health, sexual life, criminal conviction and security measures, as well as biometric and genetic data.

The administrative and technical measures taken by CoreX to protect personal data are also applied diligently with respect to special categories of personal data, and the necessary audits are carried out.

Detailed provisions regarding the processing of special categories of personal data are set out in Section 3.3 ("Processing of Special Categories of Personal Data") of this Policy.

## **2.3. Raising Awareness of and Auditing Business Units Regarding the Protection and Processing of Personal Data**

CoreX periodically provides the necessary training to raise awareness regarding the lawful processing and retention of personal data and to prevent unlawful access to personal data. In addition, CoreX establishes the necessary systems to increase its employees' awareness of personal data protection and, where necessary, works with expert consultants in the relevant field.

## **SECTION 3 - PRINCIPLES ADOPTED BY COREX REGARDING THE PROCESSING OF PERSONAL DATA**

### **3.1. Processing Personal Data in Accordance with the Principles Set Forth in the Applicable Legislation**

#### **3.1.1. Lawful and Fair Processing**

CoreX acts in accordance with the principles established by legal regulations and the general principles of trust and good faith when processing personal data, while taking into account the interests and reasonable expectations of data subjects.

### **3.1.2. Ensuring that Personal Data are Accurate and, Where Necessary, Up to Date**

CoreX makes every effort to ensure that personal data remain accurate and up to date throughout the period during which they are processed and takes the necessary measures in this regard.

### **3.1.3. Processing for Specified, Explicit and Legitimate Purposes**

CoreX clearly defines the purposes for which personal data are processed and processes personal data for purposes connected with its business activities.

### **3.1.4. Being Relevant, Limited and Proportionate to the Purposes for which they are Processed**

CoreX collects only personal data of the nature and to the extent required by its business activities and processes personal data only for the specified purposes.

### **3.1.5. Retention for the Period Prescribed by the Applicable Legislation or Necessary for the Purpose for which the Personal Data are Processed**

CoreX retains personal data for the period prescribed by applicable legislation, where such a period is specified; where no such period is prescribed, personal data are retained only for the period necessary for the purpose of processing.

## **3.2. Conditions for Processing Personal Data**

### **3.2.1. Conditions for Processing Personal Data under the KVKK**

CoreX processes personal data under the KVKK, within the scope of the commercial/legal relationship or employment relationship with the data subject, on the grounds that: (i) processing is expressly provided for by law; (ii) processing is necessary for CoreX to fulfil its legal obligation; (iii) processing is necessary for the performance of a contract to which the data subject is a party or for taking steps at the request of the data subject prior to entering into a contract; (iv) the relevant person has made the personal data public themselves; (v) processing is necessary for the protection of the life or physical integrity of the person who is unable to express consent due to actual impossibility or whose consent is not legally valid, or of another person; (vi) processing is necessary for the establishment, exercise or protection of a right; (vii) processing is necessary for the legitimate interests of the Company, provided that such processing does not prejudice the fundamental rights and freedoms of the data subject; or (viii) the data subject has given explicit consent.

### 3.2.2. Conditions for Processing Personal Data under the GDPR

CoreX processes personal data under the GDPR, within the scope of the commercial/legal relationship or employment relationship with the data subject, on the grounds that: (i) the data subject has consented to the processing of their personal data; (ii) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; (iii) processing is necessary for CoreX to comply with its legal obligation; (iv) processing is necessary to protect the vital interests of the data subject or another natural person; (v) processing is necessary for CoreX to perform a task carried out in the public interest or in the exercise of official authority vested in CoreX; and/or (vi) processing is necessary for the legitimate interests pursued by CoreX or a third party, provided that such interests do not prejudice the fundamental rights and freedoms of the data subject.

### 3.3. Processing of Special Categories of Personal Data

CoreX processes special categories of personal data in accordance with the principles set out in this Policy, upon taking all necessary administrative and technical measures, including those prescribed by the Personal Data Protection Board (the “Board”), and where one of the following conditions is met:

- The data subject has given explicit consent,
- It is expressly provided for by law,
- It is necessary for the protection of the life or physical integrity of the person who is unable to express consent due to actual impossibility or whose consent is not legally valid, or of another person,
- It relates to personal data made public by the data subject and is consistent with the data subject’s intention to make such data public,
- It is necessary for the establishment, exercise or protection of a right,
- It is necessary for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning, management and financing of health services, by persons subject to an obligation of confidentiality or by authorised institutions and organisations,
- It is necessary for the fulfilment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance,
- It relates to foundations, associations and other non-profit organisations or formations established for political, philosophical, religious or trade union purposes, provided that it is in accordance with the legislation to which they are subject and their purposes, limited to their fields of activity, not disclosed to third parties, and

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concerns their current or former members or persons who have regular contact with such organisations or formations.

### **3.4. Data Controller's Obligation to Inform Data Subjects**

In accordance with the Applicable Legislation, CoreX fulfils its obligation to inform data subjects by providing them with the required information. In this context, CoreX informs the relevant persons of who processes their personal data as the data controller and for what purposes, with whom and for what purposes the data are shared, whether the data are used in accordance with the purpose, the methods by which the data are collected, the legal basis for processing, and the rights of data subjects in relation to the processing of their personal data.

### **3.5. Processing by CoreX Holding Companies of Personal Data Processed by CoreX**

Personal data processed by CoreX may also be processed by other group companies for the purposes of conducting CoreX's activities in accordance with the group's principles, objectives and strategies and protecting CoreX's rights, interests and reputation. In this context: (i) CoreX processes and transfers personal data in accordance with the data processing conditions set forth in the Applicable Legislation; and (ii) CoreX informs data subjects in accordance with the Applicable Legislation in relation to the personal data it will transfer and obtains the explicit consent of data subjects where required by the Applicable Legislation.

### **3.6. Transfer of Personal Data**

CoreX may transfer the personal data and/or special categories of personal data of data subjects to third parties (companies, public and private institutions and organisations, and third-party natural persons) by taking the necessary security measures in accordance with the purposes of processing personal data. Our Company acts in compliance with the regulations stipulated under the Applicable Legislation when transferring personal data. Detailed information regarding the personal data processed in this context, the processing methods and the purposes of processing personal data is set out in ANNEX 5 (ANNEX 5: Third Parties to Whom Personal Data are Transferred and Purposes of Transfer) to this Policy.

#### **3.6.1. Transfer of Personal Data within Türkiye**

CoreX may transfer personal data other than special categories of personal data to third parties established in Türkiye, without being subject to the explicit consent of the data

subject, where one of the following legal grounds is present, provided that all necessary security measures, including those prescribed by the Board, are taken:

- It is expressly provided for by law,
- It is necessary for the protection of the life or physical integrity of the person who is unable to express consent due to actual impossibility or whose consent is not legally valid, or of another person,
- It is necessary for the processing of personal data belonging to the parties to a contract, provided that such processing is directly related to the establishment or performance of the contract,
- It is necessary for CoreX to fulfil its legal obligations,
- The data subject has made the personal data public themselves, provided that the transfer by the Company is limited to the purpose for which the data were made public,
- Processing is necessary for the establishment, exercise or protection of the rights of CoreX, the data subject or third parties, and therefore the transfer of personal data by CoreX is necessary,
- The transfer of personal data is necessary for the legitimate interests of CoreX, provided that such transfer does not prejudice the fundamental rights and freedoms of the data subject.

CoreX may transfer special categories of personal data within Türkiye only with the explicit consent of the data subject or where the conditions set out in Section 3.3 ("Processing of Special Categories of Personal Data") of this Policy are met.

Personal data of data subjects may be transferred by CoreX to third parties established in Türkiye for the purposes of carrying out the personal data processing purposes listed in ANNEX 2 (ANNEX 2: Purposes and Methods of Processing Personal Data). Detailed information regarding the third parties to whom personal data are transferred and the purposes of transfer is set out in ANNEX 5 (ANNEX 5: Third Parties to Whom Personal Data are Transferred and Purposes of Transfer).

### **3.6.2. Transfer of Personal Data Abroad**

#### ***Transfer Abroad under the KVKK***

CoreX may process and transfer personal data abroad with the explicit consent of data subjects. However, where one of the legal grounds listed in Section 3.6.1 of this Policy is present, personal data may be transferred abroad without the explicit consent of the data

subject, in accordance with the data transfer conditions prescribed by the applicable legislation. In such case,

- Adequate protection exists in the foreign country to which the personal data will be transferred,
- Where adequate protection does not exist,
  - An agreement that is not in the nature of an international treaty between public institutions and organisations or international organisations abroad and public institutions and organisations or professional organisations having the status of public institutions in Türkiye, and permission for the transfer having been granted by the Board,
  - Binding corporate rules approved by the Board, containing provisions on the protection of personal data with which companies within a group of undertakings engaged in joint economic activity are required to comply,
  - A standard contract announced by the Board containing matters such as data categories, purposes of data transfer, recipients and categories of recipients, technical and administrative measures to be taken by the data recipient, and additional measures for special categories of personal data, or
  - A written undertaking containing provisions ensuring adequate protection and permission for the transfer having been granted by the Board.

Without prejudice to the provisions of international treaties, where the interests of Türkiye or the relevant data subject would be seriously prejudiced, CoreX shall carry out the transfer abroad only with the permission of the Board, after obtaining the opinion of the relevant public institution or organisation.

Personal data of data subjects may be transferred by CoreX to third parties established abroad for the purposes of carrying out the personal data processing purposes listed in ANNEX 2 (ANNEX 2: Purposes and Methods of Processing Personal Data). Detailed information regarding the third parties to whom personal data are transferred and the purposes of transfer is set out in ANNEX 5 (ANNEX 5: Third Parties to Whom Personal Data are Transferred and Purposes of Transfer).

#### ***Transfer under the GDPR***

CoreX may transfer personal data and special categories of personal data to countries outside the European Economic Area ("EEA").

In order for the personal data of a data subject to be transferred to countries outside the EEA, the country to which the personal data will be transferred must be among the countries providing an adequate level of protection pursuant to decisions of the European Commission.

If the country to which the personal data will be transferred is not among the countries providing an adequate level of protection pursuant to decisions of the European Commission, CoreX may, as applicable, carry out the transfer on the basis of:

- Binding corporate rules,
- standard contractual clauses published and/or approved by the European Commission.
- If none of the above conditions are met, a transfer may be carried out under the GDPR where one of the following exceptional circumstances applies:
  - The explicit consent of the data subject,
  - The data subject entering into a contractual relationship for which the transfer of data abroad is necessary,
  - The conclusion or performance of a contract between a data controller and a third party in the interest of the data subject,
  - Public interest,
  - For the establishment, exercise or defence of legal claims,
  - For the protection of the vital interests of the data subject or other persons where the data subject is physically or legally incapable of giving consent.

Where none of these conditions applies and the transfers cannot be based on an adequacy decision or appropriate safeguards, a transfer may only be carried out where it is necessary for the compelling legitimate interests of CoreX, provided that the transfer is not repetitive and concerns only a limited number of data subjects.

#### **SECTION 4 - CATEGORISATION AND PURPOSES OF PROCESSING OF PERSONAL DATA PROCESSED BY COREX**

Personal data are processed by CoreX in a limited manner and on the basis of at least one of the personal data processing conditions set out in this Policy, in compliance with the Applicable Legislation and after informing data subjects.

Detailed information regarding the purposes of processing such personal data is set out in ANNEX 2 (ANNEX 2: Purposes and Methods of Processing Personal Data) to this Policy.

Within the framework of the purposes and conditions set out in this Policy, the categories of personal data processed and detailed information regarding such categories are set out in ANNEX 4 (ANNEX 4: Categories of Personal Data) to this Policy.

## **SECTION 5 - RETENTION AND DESTRUCTION OF PERSONAL DATA**

CoreX retains personal data for the period necessary for the purpose for which they are processed and for the minimum period prescribed under the relevant applicable legislation. In this context, CoreX first determines whether the applicable legislation prescribes a retention period for personal data and, where such a period is prescribed, complies with that period. Where no statutory period exists, personal data are retained for the period necessary for the purpose for which they are processed. At the end of the specified retention periods, personal data are destroyed in accordance with periodic destruction periods or upon a data subject's application, using the specified destruction methods (deletion and/or destruction and/or anonymisation).

Detailed information regarding the manner in which personal data are retained and destroyed is set out in the CoreX Personal Data Retention and Destruction Policy.

## **SECTION 6 - RIGHTS OF DATA SUBJECTS AND EXERCISE OF SUCH RIGHTS**

### **6.1. Rights of Data Subjects**

#### **6.1.1. Rights of Data Subjects under the KVKK**

Data subjects may exercise the following rights defined under the KVKK by applying to CoreX:

- To learn whether their personal data are being processed,
- To request information regarding such processing where their personal data have been processed,
- To learn the purpose of processing their personal data and whether such data are used in accordance with that purpose,
- To know the third parties to whom their personal data are transferred within Türkiye or abroad,
- To request correction of their personal data where they are incomplete or inaccurately processed and, pursuant to Article 7 of the KVKK, to request deletion or destruction of personal data,
- To request deletion or destruction of personal data where the reasons requiring their processing cease to exist even though such data have been processed in

accordance with the Law, and to request that the action taken in this regard be notified to third parties to whom their personal data have been transferred,

- To object to a result arising against them as a result of the analysis of their processed personal data exclusively by means of automated systems,
- To request compensation for damages where they suffer loss due to the unlawful processing of their personal data,
- To withdraw the explicit consent given for the processing and/or transfer of their personal data.

### **6.1.2. Rights of Data Subjects under the GDPR**

Data subjects may exercise, by applying to CoreX, the following rights under Chapter 3 of the GDPR: (i) the right to obtain information about processing activities, (ii) the right of access, (iii) the right to rectification, (iv) the right to erasure (right to be forgotten), (v) the right to restriction of

processing, (vi) the right to request that rectification or erasure, or restriction of processing, be communicated to third parties to whom the personal data have been transferred, (vii) the right to data portability, (viii) the right to object, (ix) the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects data subjects, and the right to withdraw consent at any time.

### **6.2. Exercise of Data Subjects' Rights**

In order to exercise the rights listed in Section 6.1 ("Rights of Data Subjects") of this Policy, data subjects must submit their requests in writing to CoreX, together with information enabling their identification, using the following communication channels:

- To the address: Yıldırım Tower, Maslak Mahallesi, Taşyoncası Sok. No:1C B2 Blok, 34485 Sarıyer/İstanbul;*
- To the address: Dilovası Organize Sanayi Bölgesi 1.Kısım Göksu Cad. No:18 Dilovası/Kocaeli;*
- To the e-mail address [kvkk@corexholding.com](mailto:kvkk@corexholding.com).

### **6.3. Company's Response to Data Subject Requests**

CoreX takes the necessary administrative and technical measures to conclude applications submitted by data subjects in accordance with the Applicable Legislation.

Where a data subject duly submits to the Company a request concerning the rights set out in Section 6.1 ("Rights of Data Subjects"), the Company shall conclude the relevant request

free of charge as soon as possible and, in any event, within 30 (thirty) days, depending on the nature of the request. However, where the process requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board.

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## **ANNEX 1 - DEFINITIONS**

The following definitions shall apply within the scope of this Policy:

- **Explicit Consent:** Consent relating to a specific matter, based on being informed and expressed freely;
- **Information Obligation:** The obligation of the data controller, when collecting personal data, to inform data subjects about the identity of the data controller and, where applicable, its representative; the purposes for which personal data will be processed; the persons to whom and purposes for which personal data may be transferred; the method and legal basis for collecting personal data; and the rights available to them.
- **Anonymisation:** Rendering personal data incapable, by any means, of being associated with an identified or identifiable natural person, even when matched with other data;
- **Binding Corporate Rules:** The data protection policy to which CoreX is subject, for use in intra-group transfers of data outside the European Union;
- **GDPR:** Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation);
- **Applicable Legislation:** Law No. 6698 on the Protection of Personal Data with respect to CoreX's personal data processing activities and the European Union General Data Protection Regulation with respect to the activities to which it applies;
- **Personal Data:** Any information relating to an identified or identifiable natural person;
- **Processing of Personal Data:** Any operation or set of operations which is performed on personal data, whether or not by automatic means, such as collection, recording, storage, retention, alteration, reorganisation, disclosure, transfer, acquisition, making available, classification or prevention of use, whether wholly or partly by automated means or by non-automated means forming part of a data recording system;
- **Board:** Personal Data Protection Board;
- **Authority:** Personal Data Protection Authority;
- **KVKK:** Law No. 6698 on the Protection of Personal Data, published in the Official Gazette No. 29677 dated 7 April 2016;
- **Special Categories of Personal Data:** Data relating to a person's race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other beliefs, appearance and clothing, membership of an association, foundation or trade union, health, sexual life, criminal conviction and security measures, as well as biometric and genetic data;

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- Policy: This CoreX Companies Personal Data Protection and Processing Group Policy;
- VERBIS: Data Controllers' Registry Information System;
- Data Processor: A third-party natural or legal person that processes personal data on behalf of CoreX based on the authorisation granted by CoreX;
- Data Subject ("Relevant Person"): A natural person whose personal data are processed;
- Data Controller: CoreX Holding, being any natural or legal person that determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system;
- CoreX Holding: Corex Holding A.Ş. and the companies incorporated within it.

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**ANNEX 2 - PURPOSES AND METHODS OF PROCESSING PERSONAL DATA**

| <b>Purposes of Processing Personal Data</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <p>Notifications to the Data Controllers' Registry Information System ("VERBİS") are also updated simultaneously when the purposes of processing personal data change. These Purposes of Processing Personal Data have been prepared in general terms for CoreX and shall be separately adapted by each CoreX entity in accordance with the company's data processing processes.</p> <p>CoreX's purposes of processing and transferring the data subject's personal data are limited, in addition to the purposes set out in its articles of association, to the purposes and legal grounds described below.</p> <p>CoreX'in, veri sahibinin kişisel verilerini işleme ve aktarma amaçları, esas sözleşmesinde yer alan amaçların yanı sıra, aşağıda açıklanan amaç ve dayanaklarla sınırlıdır.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Conducting commercial activities and business relationships                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <ul style="list-style-type: none"><li>• Conducting communication activities,</li><li>• Conducting and supervising business activities,</li><li>• Conducting the processes for the sale of goods and services,</li><li>• Conducting finance and accounting activities,</li><li>• Conducting advertising and marketing activities,</li><li>• Conducting the marketing processes for products and services,</li><li>• Conducting marketing analysis activities,</li><li>• Ensuring business continuity and conducting activities,</li><li>• Conducting the procurement processes for goods and services,</li><li>• Conducting after-sales support services for goods and services,</li><li>• Conducting processes for maintaining loyalty to companies/products/services,</li><li>• Conducting customer relationship management processes,</li><li>• Conducting contract processes,</li><li>• Conducting logistics activities,</li></ul> |

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|                                      | <ul style="list-style-type: none"> <li>• Conducting supply chain management processes,</li> <li>• Conducting reporting activities,</li> <li>• Conducting payment processes,</li> <li>• Conducting audit and internal audit processes,</li> <li>• Conducting activities in compliance with legislation,</li> <li>• Corporate organisation and event management,</li> <li>• Conducting corporate organisation and event photography/recording activities,</li> <li>• Conducting corporate communications processes,</li> <li>• Monitoring and conducting legal affairs,</li> <li>• Conducting retention and archiving activities,</li> <li>• Receiving and evaluating suggestions for improving business processes,</li> <li>• Monitoring requests and complaints,</li> <li>• Conducting investment processes,</li> <li>• Providing information to authorised institutions and organisations,</li> <li>• Conducting management activities,</li> <li>• Evaluating donation requests received from external sources.</li> </ul> |
| Conducting human resources processes | <ul style="list-style-type: none"> <li>• Fulfilling obligations arising from employment contracts and legislation for employees,</li> <li>• Conducting training activities,</li> <li>• Making Company intranet posts,</li> <li>• Conducting processes relating to benefits and advantages provided to employees,</li> <li>• Conducting occupational health and safety activities,</li> <li>• Conducting communication processes in emergencies,</li> <li>• Conducting workplace disciplinary processes,</li> <li>• Conducting employee satisfaction and engagement processes,</li> <li>• Conducting assignment processes,</li> <li>• Monitoring workplace entry and exit,</li> <li>• Creating and/or developing human resources processes and products,</li> <li>• Building the employer brand,</li> </ul>                                                                                                                                                                                                                  |

|                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                  | <ul style="list-style-type: none"> <li>• Conducting internal communication activities,</li> <li>• Implementing the remuneration policy,</li> <li>• Conducting travel and accommodation activities,</li> <li>• Conducting recruitment and placement processes for candidates, interns and students,</li> <li>• Evaluating and concluding recruitment processes for candidates by processing personal data of third parties provided as references,</li> <li>• Conducting candidates' application processes, assignment processes, performance evaluation processes and remuneration policy processes,</li> <li>• Processing work and residence permit procedures for foreign personnel,</li> <li>• Conducting activities in compliance with legislation,</li> <li>• Conducting audit and ethics activities,</li> <li>• Conducting talent and career development activities.</li> </ul>                                                                                                                          |
| Ensuring the security of persons in legal, financial or commercial relationships | <ul style="list-style-type: none"> <li>• Creating and monitoring visitor records,</li> <li>• Conducting audit and ethics activities,</li> <li>• Conducting internal audit / investigation / intelligence activities,</li> <li>• Monitoring and auditing equipment assignments, Resolving user issues and providing technical support,</li> <li>• Ensuring information security and managing processes and projects related to information security,</li> <li>• Conducting finance and accounting activities,</li> <li>• Conducting reporting activities,</li> <li>• Conducting all processes relating to websites, including design and security,</li> <li>• Monitoring and conducting legal affairs,</li> <li>• Monitoring requests and complaints,</li> <li>• Providing information to authorised persons, institutions and organisations,</li> <li>• Conducting management activities,</li> <li>• Ensuring physical premises security,</li> <li>• Conducting retention and archiving activities,</li> </ul> |

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|  | <ul style="list-style-type: none"> <li>• Monitoring and auditing workplace entry and exit,</li> <li>• Ensuring cybersecurity,</li> <li>• Providing users with Wi-Fi access.</li> </ul> |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| <b>Methods of Processing Personal Data</b>                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>CoreX carries out personal data processing activities by automated and non-automated methods in physical or electronic environments. CoreX obtains personal data through the means listed below. These Methods of Processing Personal Data have been prepared in general terms for CoreX and shall be separately adapted by each CoreX entity in accordance with the company's data processing processes.</p>        |
| <ul style="list-style-type: none"> <li>• E-mail</li> <li>• Fax</li> <li>• Telephone</li> <li>• SMS,</li> <li>• Post,</li> <li>• Courier,</li> <li>• Website,</li> <li>• Social media accounts and other platforms,</li> <li>• Online environments,</li> <li>• Hand delivery,</li> <li>• Contracts,</li> <li>• Catalogues,</li> <li>• Application forms,</li> <li>• Photographic and video camera recordings.</li> </ul> |

### ANNEX 3 - DATA SUBJECTS

These Data Subject categories have been prepared in general terms for CoreX and shall be separately adapted by each CoreX entity in accordance with the company's data processing processes.

| Category of Data Subject              | Description                                                                                                                                                                                                                 |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Academic                              | Refers to natural persons with whom CoreX works and/or from whom it obtains consultancy services within the scope of organisations such as training programmes, events and seminars, and projects conducted by the Company. |
| Employee                              | Refers to natural persons employed by CoreX under an employment contract.                                                                                                                                                   |
| Emergency Contact Person              | Refers to the person to be contacted in the event of an emergency concerning an Employee, whose contact details are provided by the Employee.                                                                               |
| Job Applicant                         | Refers to natural persons who apply for a job at CoreX.                                                                                                                                                                     |
| Reference Person                      | Refers to the person designated as a reference by a Job Applicant during the job application process.                                                                                                                       |
| Persons Designated by the Employee    | Refers to natural persons with whom the Employee communicates and/or whose personal data are collected within the scope of CoreX's processes and activities.                                                                |
| Litigation / Enforcement Counterparty | Refers to the natural persons who are counterparties to litigation and enforcement proceedings in which CoreX and/or its employees are parties, and/or their employees and authorised representatives.                      |

|                                                                  |                                                                                                                                                                                      |
|------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Event Participants                                               | Refers to natural persons and/or employees and authorised representatives of legal entities who participate in CoreX's corporate organisations and events.                           |
| CoreX Employees                                                  | Refers to natural persons employed by CoreX under an employment contract.                                                                                                            |
| Business Partner                                                 | Refers to the authorised representatives or managers of companies with which CoreX has established an alliance or partnership and/or conducts joint activities.                      |
| Shareholder/Partner                                              | Refers to CoreX's natural person shareholders and/or the authorised representatives of legal-entity shareholders.                                                                    |
| Relevant Managers                                                | Refers to natural persons acting as managers within CoreX.                                                                                                                           |
| Speakers                                                         | Refers to persons participating as speakers in organisations such as training programmes, events and seminars and in projects conducted by CoreX.                                    |
| Owner of Goods                                                   | Refers to natural persons who own goods subject to the procurement processes for goods and services and/or employees and authorised representatives of legal entities.               |
| Potential Purchaser of Products or Services / Potential Customer | Refers to natural persons and/or employees and authorised representatives of legal entities who may purchase goods or services subject to the sale processes for goods and services. |
| Intern                                                           | Refers to natural persons working at CoreX for the purpose of learning the work carried out at CoreX and gaining experience.                                                         |

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|                                              |                                                                                                                                                                                  |
|----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Persons Contacting CoreX                     | Refers to persons who contact CoreX through the Company's website or social media accounts.                                                                                      |
| Supplier Employee                            | Refers to natural persons employed by suppliers providing products and services to CoreX.                                                                                        |
| Supplier Representative                      | Refers to the natural-person authorised representatives of suppliers providing products and services to CoreX.                                                                   |
| Purchaser of Products or Services / Customer | Refers to natural persons and/or employees and authorised representatives of legal entities who purchase goods or services subject to the sale processes for goods and services. |
| Visitor                                      | Refers to natural persons visiting workplaces belonging to CoreX.                                                                                                                |

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#### **ANNEX 4 - CATEGORIES OF PERSONAL DATA**

These Personal Data Categories have been prepared in general terms for CoreX and shall be separately adapted by each CoreX entity in accordance with the company's data processing processes.

| Categories of Personal Data | Description                                                                                                                                                                                                                                                            |
|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Identity                    | Refers to personal data such as first and last name, parents' names, date of birth, place of birth, marital status, national identity card serial and sequence number, identification number and similar information.                                                  |
| Contact                     | Refers to information such as address, telephone number, e-mail address and registered electronic mail address.                                                                                                                                                        |
| Personnel                   | Refers to information such as payroll information, disciplinary investigation records, employment entry and exit records, asset declaration information, military service information, marriage information, CV/resume information and performance evaluation reports. |
| Legal Transaction           | Refers to information contained in case files and information contained in correspondence with judicial authorities.                                                                                                                                                   |
| Location                    | Refers to the location information of the place where the relevant person is located.                                                                                                                                                                                  |
| Customer Transaction        | Refers to information such as invoice, promissory note, cheque, order and request information.                                                                                                                                                                         |
| Physical Premises Security  | Refers to personal data such as employees' and visitors' entry and exit records and camera recordings.                                                                                                                                                                 |

|                         |                                                                                                                                                                                                                                                                                                              |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Internet Cookies        | Cookies are text files containing small amounts of information that are downloaded to a computer or mobile device when a website is visited and enable the website to recognise the device. Cookies constitute personal data to the extent that they make an identified or identifiable person identifiable. |
| Transaction Security    | Refers to information such as IP address information, website login and logout information, and username and password information.                                                                                                                                                                           |
| Risk Management         | Refers to information processed for the management of commercial, technical and administrative risks and similar information.                                                                                                                                                                                |
| Finance                 | Refers to information such as balance sheet information, financial performance information, credit and risk information, and asset information.                                                                                                                                                              |
| Professional Experience | Refers to information such as diploma information, courses attended, vocational training information, certificates and transcript information.                                                                                                                                                               |
| Marketing               | Refers to information such as survey responses, cookie records and information obtained through campaign activities.                                                                                                                                                                                         |
| Audio-Visual Records    | Refers to visual and audio records contained in images, such as photographs and camera footage.                                                                                                                                                                                                              |
| Health Information      | Refers to information such as disability status, blood group, personal health information, and information regarding devices and prostheses used.                                                                                                                                                            |

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|                                                                          |                                                                                                                                                                                     |
|--------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Criminal Conviction and Security Measures                                | Refers to information relating to criminal convictions and security measures.                                                                                                       |
| Travel-Related Membership Information                                    | Refers to membership information obtained during the conduct of travel arrangements.                                                                                                |
| Accommodation List                                                       | Refers to information obtained during the conduct of visitor processes.                                                                                                             |
| Damage Assessment Information                                            | Refers to information obtained by the finance and accounting unit during the conduct of damage assessment processes.                                                                |
| Information Regarding Complaints and Suggestions                         | Refers to information obtained during the recording of complaints and suggestions regarding internal Company services and the conduct of satisfaction management processes.         |
| Information Regarding Announcements                                      | Refers to information obtained during the conduct of processes relating to important professional and/or family announcements concerning employees, including identity information. |
| Information for the Allocation of Benefits                               | Refers to information obtained during processes for the proper allocation of benefits.                                                                                              |
| Information on Customs Declarations, Bills of Lading and Delivery Orders | Refers to information concerning the customer and cargo stated on customs declarations, bills of lading and delivery orders.                                                        |

## ANNEX 5 - THIRD PARTIES TO WHOM PERSONAL DATA ARE TRANSFERRED AND PURPOSES OF TRANSFER

In accordance with Section 3.6 of this Policy, CoreX may transfer personal data to the recipient groups established in Türkiye and/or abroad listed below. The third parties to whom such personal data are transferred and the purposes of transfer have been set out in general terms for CoreX and shall be separately adapted by each CoreX entity in accordance with the company's data processing processes:

- To CoreX business partners,
- To CoreX customers, suppliers and service providers,
- To CoreX Group Companies,
- To its affiliates and subsidiaries,
- To authorised public institutions and organisations,
- To relevant natural persons or legal entities under private law,
- To C4C users, CRM Vtiger users and courier companies.

| Third Parties to Whom Personal Data Are Transferred | Purposes of Transfer                                                                                                                                                        |
|-----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To CoreX business partners                          | Limited to ensuring fulfilment of the purpose for which the business partnership was established                                                                            |
| To CoreX customers, suppliers and service providers | Limited to enabling the provision to CoreX of services procured by CoreX from suppliers on an outsourced basis and necessary for CoreX to conduct its commercial activities |

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|                                                                 |                                                                                                                                                                                                                                 |
|-----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To CoreX Group Companies                                        | Limited to planning strategies relating to CoreX's commercial activities, conducting commercial activities requiring the participation of CoreX, maintaining intra-group reporting and activities, and audit purposes           |
| To affiliates and subsidiaries                                  | Limited to planning strategies relating to CoreX's commercial activities, conducting commercial activities requiring the participation of group companies, maintaining intra-group reporting and activities, and audit purposes |
| To authorised public institutions and organisations             | Limited to the information requested for the purposes of fulfilling legal obligations within the legal authority of the relevant public institutions and organisations                                                          |
| To relevant natural persons or legal entities under private law | Limited to the performance of the contract with natural persons or legal entities under private law having a legal/commercial relationship with CoreX                                                                           |
| To C4C users, CRM Vtiger users and courier companies            | Limited to ensuring fulfilment of the purpose of the commercial relationship with CoreX                                                                                                                                         |

## **ANNEX 6 - SECURITY OF PERSONAL DATA**

CoreX takes all necessary technical and administrative measures to ensure an appropriate level of security in order to prevent unlawful processing of personal data and unlawful access to personal data and to ensure the lawful retention of personal data. CoreX retains personal data accurately and up to date using the methods published on the VERBİS website, including but not limited to those listed below. These data security measures have

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been prepared in general terms for CoreX and may be separately adapted by each CoreX entity in accordance with the company's data processing processes:

- Implementation of key management,
- Ensuring network and application security,
- Taking security measures within the procurement, development and maintenance of information technology systems,
- Ensuring the security of personal data stored in the cloud,
- Regularly maintaining access logs,
- Preparing and implementing corporate policies concerning access, information security, use, retention and destruction,
- Executing confidentiality undertakings,
- Revoking the authorisations of employees whose duties have changed or whose employment has terminated,
- Using up-to-date anti-virus software,
- Using firewalls,
- Determining personal data security policies and procedures,
- Regularly monitoring personal data security,
- Taking security measures for entry to and exit from physical environments containing personal data,
- Ensuring the security of physical environments containing personal data against external risks (fire, flood, etc.),
- Ensuring the security of environments containing personal data,
- Backing up personal data and ensuring the security of backed-up data,
- Implementing and monitoring user account management and access control systems,
- Conducting / having conducted periodic and/or random internal audits,
- Maintaining log records in a manner that prevents user intervention,
- Identifying existing risks and threats,
- Using intrusion detection and prevention systems,
- Taking cybersecurity measures and monitoring their implementation,
- Ensuring data processing service providers' awareness of data security,
- Using data loss prevention (DLP) software,
- Providing employees with regular training and awareness activities on data security,
- Establishing and implementing an access authorisation matrix for employees,
- Where special categories of personal data are sent by e-mail, using encrypted transmission and KEP/corporate e-mail,

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- Using secure encryption/cryptographic keys for special categories of personal data and ensuring that key management is carried out by different units,
- Including data security provisions in contracts,
- Encrypting personal data.

Where personal data are processed on behalf of CoreX by another natural or legal person, CoreX exercises the utmost care with respect to the matters to be considered in identifying the relevant data processor and is jointly responsible with the data processors for taking the measures set out in this Policy.

CoreX also carries out or has carried out the necessary audits within its own institutions or organisations and, where possible, at the premises of data processors, in order to ensure the implementation of the provisions of the Applicable Legislation.

Where processed personal data are unlawfully obtained by others, CoreX shall notify the Board of this situation within 72 (seventy-two) hours at the latest. Where necessary, the Board may announce the incident on its website or by another method it deems appropriate. In addition, once the persons affected by the data breach have been identified, the breach must be notified to the relevant persons within a reasonable period.

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