DATA PROTECTION AND INFORMATION SECURITY POLICY

TABLE OF CONTENTS

About This Policy 2
About Bosch 2
Data Protection and Information Security Policy 3
Our Principles for Processing Personal Data 4
Categories of Data Subject 5
When Do We Collect Personal Data About You? 6
Which Personal Data Do We Process About You? 7
For Which Purposes and Legal Reasons Do We Process Your Personal Data? 8
When Do We Share Your Personal Data? 9
How Long Do We Retain Your Personal Data? 10
How Do We Protect Your Personal Data? 12
How Can You Submit Your Requests Regarding Your Personal Data? 13
Changes and Updates to the Policy 14
ANNEX – Definitions and Abbreviations 14

ABOUT THIS POLICY

As Bosch Rexroth Otomasyon Sanayi ve Ticaret A.Ş., we value the confidentiality and security of your personal data. In this context, we would like to inform you about how we process the personal data we obtain from our customers, suppliers, business partners, their employees and representatives and all other third parties while conducting our business relations, for what purposes we use it and how we protect such information.

All terms and expressions used in this Data Protection and Information Security Policy (“**Policy**”) have the meaning ascribed to them in the Personal Data Protection Law No. 6698 (“**PDPL**”) and other applicable legislation. You may take a look at the **ANNEX - Definitions and Abbreviations** section for the meanings of the terms and abbreviations used in the Policy.

This Policy has been prepared in order to provide general information about the processing of your personal data and safeguards taken during these activities by our Company. Our personal data processing purposes and legal reasons are explained in detail in the data protection notices which are being prepared specifically for each activity during which we process your personal data.

The terms “We”, "Us", “Company” or “Bosch” in the Policy refer to the Bosch Rexroth Otomasyon Sanayi ve Ticaret A.Ş., registered with the Bursa Trade Registry with the number 75190, operating at the address Işıktepe OSB Mahallesi Siyah Cadde No: 29 Nilüfer Bursa / Türkiye, carrying the personal data processing activities as the Data Controller.

ABOUT BOSCH

The Bosch Group is one of the world's leading suppliers of technology and services. Bosch's activities are divided into four sectors: Mobility, Industrial Technologies, Consumer Durables and Energy & Building Technology. Together with its business activities, the company aims to use technology to help shape universal trends such as automation, electrification, digitalization, connectivity and sustainability. In this context, Bosch's broad diversification across different regions and industries strengthens the company's innovation and resilience. Using its proven expertise in sensor technology, software and services, Bosch offers its customers cross-domain solutions from a single source. It also uses its expertise in connectivity and artificial intelligence to develop and manufacture user-friendly and sustainable products. With its “Invented for life” approach, Bosch aims to improve the quality of life and protect natural resources. The Bosch Group consists of Robert Bosch GmbH and around 500 subsidiaries and regional companies in around 60 countries. With sales and

service partners included, Bosch's global production, engineering and sales network covers almost every country in the world. The foundation of the company's future growth lies in its innovative strength.

Bosch Türkiye operates in Istanbul, Bursa, Kocaeli, Manisa and Tekirdağ with five separate companies in the fields of Mobility, Industrial Technologies, Consumer Durables and Energy & Building Technologies. Bosch Group, which first started its activities in Türkiye with a representative office established in 1910, established its first factory in Bursa in 1972. With a total of five R&D Centers in Bursa, Manisa and Tekirdağ, and two Design Centers in Istanbul and Bursa, Bosch Türkiye is one of the country's leading technology and service suppliers.

DATA PROTECTION AND INFORMATION SECURITY POLICY

This policy covers all information assets, business processes and related parties of Bosch. As Bosch, with the “Data Protection and Information Security Policy”, we ensure the protection of the confidentiality, integrity and accessibility of our assets, the mitigation of the risks of business processes to an acceptable level and ensure compliance with the PDPL and ISO 27001 standard. The “Data Protection and Information Security Policy”, created by Bosch top management for the purposes of:

- Protecting our Company's credibility and corporate reputation,
- Continuing our Company's activities without interruption,
- Ensuring compliance with all legal regulations and contracts related to information security,
- Creating information security awareness for the parties involved internally and externally in our company and informing them of their respective obligations,
- Carrying out trainings to improve technical and behavioral competencies in order to raise awareness on information security,
- Ensuring the compliance with the requirements of the Personal Data Protection Law No. 6698,
- To ensure that personal data are protected during the retention periods in accordance with the PDPL and to ensure that they are securely destroyed at the end of these periods,

has been approved by the top management; and undertakes to realize the practices for “Information Security”, to manage them systematically, to ensure continuous improvement of the system and to allocate the resources required by the system.

Kindly submitted to your information.

OUR PRINCIPLES FOR PROCESSING PERSONAL DATA

All personal data processed by our Company are processed in accordance with the PDPL and other applicable legislation. The fundamental rules and principles that we take into consideration when processing your personal data pursuant to Article 4 of the PDPL are as follows:

• **Processing in accordance with the Lawfulness and Fairness:** Our Company acts in accordance with the principles introduced by legal regulations and the general rule of trust and fairness in the processing of personal data. In this context, our Company takes into account the principle of proportionality in the processing of personal data and does not use personal data for purposes other than those intended.

• **Ensuring that Personal Data is Accurate and Up-to-Date When Necessary:** Our Company takes reasonable measures to ensure that the personal data being processed is accurate and up-to-date, taking into account the fundamental rights of the data subjects and their legitimate interests.

• **Processing for Specific, Clear and Legitimate Purposes:** Our Company clearly and precisely determines the purpose of processing personal data that is legitimate and lawful. Our Company processes personal data in connection with and to the extent necessary for the products and services it offers.

• **Being Relevant, Limited and Proportionate to the Purpose of Processing:** Our Company processes personal data in a manner that is suitable for the fulfillment of the specified purposes and avoids the processing of personal data that is not related to the purpose or is not needed.

• **Retention for the Period Stipulated in the Relevant Legislation or Required for the Purpose for which the Personal Data are Processed:** Our Company retains personal data only for the period specified in the relevant legislation or required for the purpose for which they are processed. In this context, our Company first determines whether a period of time is stipulated for the storage of personal data in the relevant legislation, if a period is determined, we act in accordance with this period, and if a period is not determined, we keep personal data for the period required for the purpose for which they are processed. Personal data are deleted, destroyed or anonymized by our Company in the event that the period expires or the reasons requiring their processing are no longer valid.

CATEGORIES OF DATA SUBJECT

There are many different categories of data subjects whose personal data are processed by our Company. The table below includes some of the categories of data subjects whose personal data are processed by our Company:

DATA SUBJECT CATEGORIES	DESCRIPTION
Customer	Natural or legal persons who purchase our products and services.
Potential Customer	Natural or legal persons who have made a request or interest in purchasing our products or benefiting from our services or who have been evaluated in accordance with the principles of common practice and fairness that they may have this interest.
Visitor	Natural persons who enter the physical facilities (offices, etc.) owned or organized by our Company for various purposes or who visit our websites.
Third Person	Third party natural persons who are associated with the above-mentioned parties in order to ensure the security of commercial transactions between our Company and the above-mentioned parties or to protect the rights of the aforementioned persons and to provide benefits; or all natural persons whose personal data our Company has to process for a specific purpose, even if it is not explicitly stated within the scope of the Policy.

Employees, Shareholders, Representatives of the Organizations We Cooperate with	Natural persons working in organizations (including but not limited to business partners, suppliers, etc.) with which our Company has all kinds of business relations, including shareholders and representatives of these organizations.

We would like to point out that the data subjects other than the specified above may also submit their requests to our Company within the scope of PDPL and their requests will also be taken into consideration and evaluated.

WHEN DO WE COLLECT PERSONAL DATA ABOUT YOU?

We collect your personal data mainly in the cases below:

- When you purchase or use our products or services,
- When you sell us goods or provide us with services,
- When you subscribe to our newsletters, when you opt-in to receive our marketing messages,
- When you contact us by means such as e-mail or telephone to submit a complaint or give feedback,
- When you apply for a position at our Company,
- When you attend our Company events, seminars, conferences and organizations,
- When you contact us for any purpose as a potential customer/supplier/business partner/subcontractor.

We process the personal data we obtain in the cases above in accordance with this Policy and the purposes specified in the data protection notices prepared specific to the relevant activities.

WHICH PERSONAL DATA DO WE PROCESS ABOUT YOU?

The personal data we process about you varies according to the type of relationship between you and our Company and the way you contact us. Examples of the personal data we process about you are as follows:

PERSONAL DATA CATEGORIES	EXAMPLES
Identity	Information found on identity documents such as name, surname, title, date of birth.
Communication	E-mail address, phone number, full address.
Finance	Bank account data, billing information.
Transaction Security	IP address information, website entrance and exit information, password information.
Legal Transaction	Information in correspondence with judicial authorities, information in case files.
Risk Management	Information processed for the governance of commercial, technical and administrative risks.
Customer Transaction	Information such as order information, request information.

FOR WHICH PURPOSES AND LEGAL REASONS DO WE PROCESS YOUR PERSONAL DATA?

Our purposes and legal reasons for using your personal data vary depending on the type of relationship between you and our Company. Our purposes and legal reasons for processing your personal data are explained in detail in the data protection notices prepared specifically for each activity, during which we process your personal data. Below are examples of our personal data processing purposes, legal reasons and the activities during which we process your personal data:

PROCESSING PURPOSES	LEGAL REASONS	EXAMPLES
Conducting direct marketing processes	**PDPL Art. 5/1** "*Explicit consent of the data subject*"	To make marketing notifications regarding our services via e-mail, SMS and telephone, to send satisfaction surveys, to send commercial electronic messages
Fulfillment of obligations arising from legislation	**PDPL Art. 5/2-a** "*Clearly stipulated in the law*"	To collect the information necessary for the issuance of invoices within the scope of Article 230 of the Tax Procedure Law No. 213
Carrying out contract processes	**PDPL Art. 5/2-c** "*It is directly related to the establishment or performance of a contract*"	To carry out the sales transactions of our products, to present offers to our customers, to carry out purchasing processes with our suppliers and to sign, review and organize the necessary subcontracts/protocols within the scope of the contracts made, to fulfill the obligations arising from the signed contracts

Compliance with legal obligations	**PDPL Art. 5/2-ç** "*It is necessary for compliance with a legal obligation*"	To fulfill the requirements of information and document requests directed by official authorities
Conducting processes related to the protection of our Company's rights and interests	**PDPL Art. 5/2-e** "*Data processing is necessary for the establishment, exercise or protection of any right*"	To protect the rights and interests of our company against legal claims such as lawsuits, investigations, etc. filed against our company, and to apply to other legal remedies such as mediation, litigation, enforcement, arbitration committee when necessary
Establishing and managing customer relationships	**PDPL Art. 5/2-f** "*Processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject*"	Answering your questions about our services, providing support for the requests you submit through our communication channels
Execution of reporting and audit processes		Carrying out the necessary internal audit and reporting processes to ensure compliance with the policies and procedures of Bosch group companies

WHEN DO WE SHARE YOUR PERSONAL DATA?

We share your personal data with authorized authorities and institutions, service providers in Türkiye and Bosch Türkiye group companies in accordance with Article 8 of the PDPL, the conditions stipulated in other relevant legislation, the decisions of the Board; by taking the necessary security measures specified in the legislation.

We also share your personal data with parties abroad in order to carry out our activities in the most efficient way, especially to provide technical infrastructure services.

We share your personal data with foreign parties in accordance with Article 9 of the PDPL in the event that there is an adequacy decision issued by the Board regarding the country, sector within the country or international organization to which the transfer will be made.

If there is no adequacy decision, we share it based on the appropriate safeguards specified in Article 9 of the PDPL, provided that the data subject can exercise their rights and apply for effective legal remedies in the recipient country.

In exceptional cases where there is no adequacy decision and appropriate safeguards cannot be provided, we share your personal data with parties abroad on an incidental basis, provided that the conditions specified in Article 9 of the PDPL are met.

We carefully and diligently select the parties we share with in foreign countries. All parties we share with are obliged to protect confidentiality and comply with legal regulations. These parties may also be other Bosch group companies abroad.

HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

We retain your personal data only for the period necessary to fulfill the purpose for which they were collected. We determine these periods separately for each data processing activity and at the end of the respective periods, if there is no reason for us to keep your personal data, we will dispose of your personal data in accordance with the PDPL.

We take the following criteria into account when determining the disposal periods of your personal data:

- The period accepted as per the general practice in the sector in which the data controller operates within the scope of the purpose of processing the relevant data category
- The duration of the legal relationship established with the data subject which makes it necessary to process the personal data in the relevant data category,
- The period during which the legitimate interest to be pursued by the data controller depending on the purpose of processing the relevant data category will be valid in accordance with lawfulness and fairness,
- The period during which the risks, costs and responsibilities of storing the relevant data category depending on the purpose of processing will continue legally,
- Whether the maximum period to be set is appropriate to keep the relevant data category accurate and, where necessary, up to date,

- The period during which the data controller is legally obliged to store the personal data of the relevant data category,
- The statute of limitations set by the data controller for the assertion of a right related to the personal data in the relevant data category.

The data storage environments where the personal data processed by our Company are kept and the explanations regarding them are provided in the table below:

DATA STORAGE ENVIRONMENTS	DESCRIPTION
Servers	We store some of the personal data we process on servers. Personal data stored on servers are deleted or anonymized at the first periodic disposal period following the end of the retention period.
Electronic Environment	We store some of the personal data we process in electronic media such as databases. Personal data in electronic media are deleted or anonymized at the first periodic disposal period following the end of the retention period.
Secure Physical Environment	We store some personal data in secure physical environments such as archives and locked cabinets. Personal data stored in secure physical environments are removed during the first periodic disposal period following the end of the retention period by drawing, painting or blackening in such a way that they cannot be read or destroyed by methods such as paper shredders.
Portable Media	The connection of portable storage media such as flash memory, company mobile phone, external hard disk, SD card to Company devices is restricted. Personal data stored in these media are deleted at the first periodic disposal period following the end of the retention period.

Our Company reserves the right not to fulfill the request of the data subject in cases where our Company has the right and/or obligation to preserve personal data in accordance with the provisions of the relevant legislation.

HOW DO WE PROTECT YOUR PERSONAL DATA?

The protection of your personal data is ensured by our Company in compliance with Article 12 of the PDPL and necessary technical and administrative measures are taken, especially those specified in the Personal Data Security Guide published by the Authority. The technical and administrative measures taken by our Company are as follows:

- Network security and application security are ensured.
- Closed system network is used for personal data transfers through the network.
- Key management is implemented.
- Security measures are taken within the scope of procurement, development and maintenance of information technology systems.
- Security of personal data stored in the cloud is ensured.
- There are disciplinary regulations that include data security provisions for employees.
- Training and awareness activities on data security are conducted for employees at regular intervals.
- An authorization matrix has been established for employees.
- Access logs are kept regularly.
- Corporate policies on access, information security, use, retention and destruction have been prepared and implemented.
- Data masking measures are applied when necessary.
- Confidentiality undertakings are made.
- Employees who change their duties or leave their jobs are de-authorized in this area.
- Up-to-date anti-virus systems are used.
- Firewalls are used.
- Signed contracts contain data security provisions.
- Extra security measures are taken for personal data transferred via paper and the relevant document is sent in confidentiality-grade document format.
- Personal data security policies and procedures have been determined.
- Personal data security issues are reported in a rapid manner.
- Personal data security is monitored.

- Necessary security measures are taken for entry and exit to and from physical environments containing personal data.
- Physical environments containing personal data are secured against external risks (fire, flood, etc.).
- Security of environments containing personal data is ensured.
- Personal data is minimized as much as possible.
- Personal data is backed up and the security of backed up personal data is also ensured.
- User account management and authorization control system is implemented and monitored.
- Internal periodic and/or random audits are carried out and made to be carried out.
- Log records are kept without user intervention.
- Existing risks and threats have been identified.
- Protocols and procedures for the security of special categories of personal data have been determined and implemented.
- If special categories of personal data are to be sent via electronic mail, they are sent encrypted and sent using Registered Electronic Mail (“**KEP**”) or corporate mail account.
- Secure encryption / cryptographic keys are used for special categories of personal data and managed by different departments.
- Cyber-attack detection and prevention systems are used.
- Penetration testing is applied.
- Cyber security measures have been taken and their implementation is constantly monitored.
- Encryption is performed.
- Special categories of personal data transferred on portable memory sticks, CDs and DVDs are encrypted.
- Awareness of data processing service providers on data security is ensured.
- Data loss prevention software is used.

HOW CAN YOU SUBMIT YOUR REQUESTS REGARDING YOUR PERSONAL DATA?

Pursuant to Article 11 of the PDPL, you can submit your requests regarding your personal data to us free of charge **in person** or via **Notary Public** or by **KEP** after signing with your secure electronic signature within the scope of the Electronic Signature Law No. 5070.

You may find the application form to be used for the submission process, our address information and all other details **here**.

CHANGES AND UPDATES TO THE POLICY

We would like to remind you that we may make updates to this Policy due to the amendments to the provisions of the legislation that may change over time and changes that may occur in our company policies. We will publish the most up-to-date version of the Policy on our website. You can access the update date and version information of this Policy below.

Last update: **20.07.2026**

Version: **v2.1**

ANNEX – DEFINITIONS AND ABBREVIATIONS

Anonymization	**:**	

		Making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even if it is matched with other data.
We / Us / Company / Bosch	:	Bosch Rexroth Otomasyon Sanayi ve Ticaret A.Ş.
Data Subject	:	The natural person whose personal data are processed.
Disposal	:	Deletion, destruction or anonymization of personal data.
Processing / Processing of Personal Data	:	All kinds of operations performed on personal data such as obtaining, recording, saving, storing, retaining, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or by non-automatic means provided that it is part of any data recording system.
Transfer of Personal Data Abroad	:	Transmission of personal data by a data controller or data processor within the scope of Law No. 6698 to a data controller or data processor abroad or making it accessible by any other means.
PDPL	:	Personal Data Protection Law No. 6698, which was enacted after being published in the Official Gazette dated April 7, 2016 and numbered 29677.

Board	:	Personal Data Protection Board.

Authority	:	Personal Data Protection Authority.
Art.	:	Article.
Special Categories of Personal Data	:	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data.
Periodic Disposal	:	Deletion, destruction or anonymization to be carried out ex officio at recurring intervals specified in the Personal Data Storage and Destruction Policy in the event that all of the conditions for processing personal data specified in the Law are no longer valid.
Policy	:	This Data Protection and Information Security Policy.
Deletion	:	Making personal data inaccessible and non-reusable in any way for the respective users.
Data Processor	:	A natural or legal person who processes personal data on behalf of the data controller based on the authorization granted by the data controller.
Data Controller	:	

		The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.