

ANADOLU EFES BİRACILIK VE MALT SANAYİİ A.Ş. INFORMATION ON PROCESSING AND PROTECTION OF PERSONAL DATA OF SHAREHOLDERS

1. PURPOSE AND SCOPE

This information document informs you on how **Anadolu Efes Biracılık ve Malt Sanayii A.Ş.** (“Anadolu Efes” or “Company”) will collect, process and manage your personal data mentioned herein.

Anadolu Efes respects your personal data and privacy. This information document explains for which purpose and based on which legal grounds we will process and share your personal data with third parties; how we will process this data and how you can use your rights that you have under the Law on Personal Data Protection numbered 6698 (“Law”).

2. INFORMATION ABOUT OUR DATA PROCESSING ACTIVITY

2.1 Identity of Data Controller

Data Controller of data processing activities mentioned in this document, is **Anadolu Efes Biracılık ve Malt Sanayii Anonim Şirketi**.

2.2 Purpose and Legal Grounds for Processing Your Personal Data

Your personal data (your name and surname, TR identity number, passport number, foreigner tax number, scope of your tax liability (limited/full), communication information, brokerage firm account information, bank/branch to which you have credit debt and the amount of your debt, bank account information, date of your loan agreement, etc.) which will be shared by you as per item (c) of Paragraph 2 of Article 5 of the Communiqué on Rules and Procedures Regarding Implementation of Temporary Article 13 of the Turkish Code of Commerce no. 6102 published on the Official Gazette dated 17 May 2020 and numbered 31130 (“Communiqué”), will be processed by the Company for the purposes set forth herein based on the legal grounds provided in items (a) (*it is expressly provided for by the laws*), (ç) (*it is necessary for compliance with a legal obligation to which the data controller is subject*) and item (e) (*data processing is necessary for the establishment, exercise or protection of any right*) of paragraph 2 of Article 5 of the Law.

Within this scope, we would like to inform you that your above mentioned personal data will be processed in order to distribute dividend to you according to the principles and exceptions set forth in the Communiqué; to perform legal, operational and accounting transactions with regards to dividend distribution and to evidence the distribution to the General Directorate of Internal Commerce of the Ministry of Commerce as per item (c) of Paragraph 1 of Article 6 of the Communiqué.

You can find additional information about purposes of processing and transfer of your personal data by our Company, on the Anadolu Efes Biracılık ve Malt Sanayii Anonim Şirketi Policy of Personal Data Protection reachable at <http://www.anadoluefes.com.tr>

2.3 With Whom and For Which Purposes We Share Your Personal Data?

Your above mentioned personal data will be shared with the General Directorate of Internal Commerce of the Ministry of Commerce in order to evidence that dividend distribution is made in compliance with item (c) of Paragraph 1 of Article 6 of the Communiqué.

Your personal data might be transferred to public institutions and authorities and business partners of the Company based on the legal grounds such as performance of legal obligations of the Company; necessity of data processing for Company’s legitimate interest and necessity of data processing for the establishment, exercise or protection of any right in case of a legal proceeding.

To ensure safe and regular preservation, your data might be stored in servers of contracted software companies providing cloud storage services to the Company.

Besides, due to services purchased by contracted IT firms for technology and IT purposes, mentioned IT firms might reach your personal data based on technical support and services and any necessity.

2.4 With Which Method We Process Your Personal Data?

Your personal data is processed in electronic or physical environment by wholly or partially automated means or by non-automated means which provided that form part of a data filing system.

3. Rights That You -As Data Subjects- Have Under The Law

As per Article 11 of the Law, each person –as data subject- has the right to request to the data controller about him/her;

- a) to learn whether his/her personal data are processed or not,
- b) to demand for information as to if his/her personal data have been processed,
- c) to learn the purpose of the processing of his/her personal data and whether these personal data are used in compliance with the purpose,
- c) to know the third parties to whom his personal data are transferred in country or abroad,
- d) to request the rectification of the incomplete or inaccurate data, if any,
- e) to request the erasure or destruction of his/her personal data under the conditions referred to in Article 7 of the Law,
- f) to request reporting of the operations carried out pursuant to sub-paragraphs (d) and (e) to third parties to whom his/her personal data have been transferred,
- g) to object to the occurrence of a result against the person himself/herself by analyzing the data processed solely through automated systems,
- h) to claim compensation for the damage arising from the unlawful processing of his/her personal data.

In case you convey your relevant requests to **Anadolu Efes Biracılık ve Malt Sanayii A.Ş.** as data controller, the Company will finalize your request within the shortest time period possible depending on your request but within 30 (thirty) days at the latest. Nevertheless, if the request causes an additional cost, the relevant cost determined by the Personal Data Protection Board will be demanded by the Company. You can deliver your request including your explanations related to the rights that you wish to use, by filling the form provided at www.anadoluefes.com.tr in line with instructions set forth in the form and by either delivering by hand an original signed version of the form at the address Fatih Sultan Mehmet Mah. Balkan Cad. Buyaka E Blok No:58/24 34771 Ümraniye/İstanbul/Turkey together with the documents evidencing your identity; or by sending it via Notary or other methods provided in the Law or by conveying it with your secured electronic signature at the address anadoluefes@anadoluefes.hs03.kep.tr.

ANADOLU EFES BİRACILIK VE MALT SANAYİİ A.Ş.

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