

Personal Data Protection and Processing Policy

The purpose of this Personal Data Protection and Processing Policy ("Policy") is to determine the terms and conditions regarding the use and storage of personal data or communication information of users or companies who will benefit from the Human Resources and Personnel Management System ("Platform") provided through the www.layersup.com website ("Site") owned by Layers Software and Human Resources Services Anonymous Company ("Layers") and obtained from the employees of the Human Resources and Company ("Employees") who will benefit from the services.

Which Data is Processed?

Under this heading, the data that are considered personal data in accordance with the Personal Data Protection Law No. 6698 ("Law No. 6698") provided by the Employees to Layers during the creation of an account and/or obtained from the Employees during the use of the Platform are listed. Unless otherwise explicitly stated, the term "personal data" within the scope of the Policy will refer to the information listed below in accordance with the provisions and conditions stated in the Policy. Layers collects the following data provided in digital media by the Employee during the account creation process: name, surname, identification information, address, work or personal e-mail address, phone number, communication information, password used for identity verification and account access, and similar security and transaction information. Layers can obtain information about the use of the Site and Platform by Employees through cookies, which are a technical communication file, and IP information is collected through cookies to detect access and usage habits to the services provided on the Platform. In accordance with articles 3 and 7 of the Law, the data that are irreversibly anonymized will not be considered personal data under the provisions of the Law and processing activities related to such data will be carried out regardless of the provisions of this Policy.

What Purposes are Data Used for?

Layers will use the personal data provided by Employees for the purpose of opening an Employee's Platform account and providing services related to the Platform. Layers may also process the aforementioned personal data to improve its services, develop the service, inform the Company or Employees as necessary, and fulfill obligations arising from the nature of the service it provides. The personal information in question may be used to contact the Company or Employee, or to improve the Company's and Employees' experience on the Platform (such as developing existing services, creating new services, and providing personalized services). Additionally, Layers may use the information for reporting and business development activities, for making various statistical evaluations without revealing the Employee's identity, for creating a database, and for conducting market research. With the Employee's consent, the information may also be processed by Layers and its partners for direct marketing purposes, stored, transmitted to third parties, and used to communicate notifications related to various applications, products, and services, as well as maintenance and support activities. Layers may also process and share data with third parties without the separate consent of Employees if required by Article 5 and 8 of the Law and/or if the conditions in the relevant legislation exist. The main cases where the Employee's information may be processed without obtaining explicit consent are: if expressly provided for by law, if necessary to protect the life or physical integrity of the individual or someone else who is unable to disclose their consent due to actual impossibility or whose consent is not legally valid, if necessary for the establishment or performance of a contract directly related to the Employee, if necessary to fulfill legal obligations, if publicly disclosed by the Employee, if necessary to establish, use, or protect a right, and if necessary for Layers' legitimate interests, provided that it does not harm the Employee's fundamental rights and freedoms. As mentioned above, Layers may use cookies and process data for third-party analysis services only to the extent required by these services. Technical communication files are small text files sent to the browser to be stored in the main memory. Technical communication files facilitate the use of the internet by storing information about the status and preference settings of a website. They are designed to obtain statistical information about how many people use internet sites over time, how many times an individual visits a website for a particular purpose, and how long they stay on the

site, as well as to help generate dynamic advertisements and content on user pages specially designed for Employees. Technical communication files are not designed to collect any other personal data from main memory. Most browsers are designed to accept technical communication files by default, but Employees can always change their browser settings to prevent these files from being sent or to receive notifications when they are sent. Layers also has the right to associate the behavior of Employees on the Site and Platform with a cookie in the browser to enable online behavioral advertising and marketing, as well as to define remarketing lists based on metrics such as the number of pages viewed, the length of the visit, and the completion of goals.

Who Can Access the Data?

Layers may transfer the personal data of Employees and the new data obtained through the use of this personal data to third parties that Layers benefits from for the performance of the obligations it has committed to the Company and Employees in limited scope to provide these services. In order to improve (including improvement and personalization) the Employee experience, ensure the security of the Company and Employees, detect fraudulent or unauthorized uses, conduct operational evaluation research, fix errors related to the Site, Platform, or Layers services, and achieve any of the purposes in this Policy, Layers may share personal data with third parties such as external service providers, hosting service providers, law firms, research companies, call centers. The Employee accepts that third parties mentioned above may store the personal data of Employees anywhere in the world, subject to the limited purposes mentioned above. Employee Rights to Access and Correct Data Employees have the right to apply to Layers under Article 11 of the Law to learn whether their personal data is processed; to request information if personal data has been processed, to learn the purpose of the processing of personal data, and whether they are used appropriately for that purpose; to know the third parties to whom personal data is transferred domestically or abroad; to request the correction of incomplete or inaccurate personal data; to request the deletion or destruction of personal data within the framework of the relevant legislation; to demand that the correction, deletion, and destruction procedures carried out be notified to third parties to whom personal data is transferred; to object to a result that arises against them by the exclusive analysis of the processed data through automated systems; to request compensation in case of damage due to the unlawful processing of personal data. Employees can submit the above-mentioned requests in writing to Fatih Sultan Mehmet Mh. Balkan Cd. Meydan Istanbul AVM Blok No: 62a Umraniye, Istanbul, Turkey. Layers may provide its reasoned positive/negative response to the requests in writing or digitally. No fee shall be charged for the necessary procedures related to the requests. However, if any cost is required for the procedures, it is possible to demand a fee based on the tariff determined in accordance with Article 13 of the Law by the Personal Data Protection Board. The Employee undertakes to ensure that the information subject to this Policy is complete, accurate, and up-to-date, and to immediately update any changes in this information. If the Employee does not provide up-to-date information, Layers will not be liable for any such omission. If the Employee makes a request that will result in the inability to use the services specified in the Human Resources and Personnel Management System User Agreement, Layers accepts that he/she and/or the Company may not benefit from the services specified and that any liability arising from this will belong to the Employee.

Retention Period of Personal Data

Layers, in order to enable the Company and Employees to benefit from the Platform and to provide the services subject to the Platform, and to fulfill the obligations arising from the Human Resources and Personnel Management System User Agreement and this Policy that arise from the nature of the Platform and related services, will keep the personal data provided by Employees during the provision of services. In addition, Layers may keep personal data for a limited period of time as required by the relevant legislation and to the extent necessary to make the necessary defenses in case of any disputes that may arise between Layers, the Company, and/or Employees. Regarding Measures and Commitments for Data Security, Layers undertakes to take the necessary technical and administrative measures to ensure the appropriate level of security to maintain the confidentiality of personal data, prevent unauthorized access to personal data, and prevent the unlawful processing of personal data in accordance with the terms and conditions specified in the relevant legislation or this Policy, and to carry out the necessary

audits. Layers cannot disclose the personal data obtained about the Employees to third parties in violation of this Policy and the Law, and cannot use it for purposes other than processing. Layers may change this Policy at any time. The current Policy becomes effective when it is presented to the Company and/or Employees by any means. Layers shall not be held responsible for the privacy policies and contents of other applications to which links are provided through the Site and Platform.