

YILPORT SWEDEN TERMINAL INVESTMENTS AB

PRIVACY POLICY

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1. Introduction

This privacy policy (“**Privacy Policy**”) is prepared by Yilport Sweden Terminal Investments AB, company registration number 556967-4608, (“**Yilport Sweden**”), a Yilport Holding A.Ş. group company. This Privacy Policy outlines Yilport Sweden’s and its group companies’, including Yilport Gävle AB, company registration number 559007-6898, and Yilport Sweden Logistics AB, company registration number 556937-5008, (jointly the “**Company**”), practices, as Controllers, concerning the collection, use, and protection of your personal data, in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council, known as General Data Protection Regulation (“**GDPR**”), the Swedish Data Protection Act 2018:18 and other applicable legislation regulating the Company’s Processing of personal data (jointly “**Privacy Laws**”).

This Privacy Policy consists of this main document and the Annexes listed in the last section.

We are dedicated to safeguarding the privacy and confidentiality of the personal information entrusted to us. Committed to transparency and data security, we understand the significance of your privacy and strive to maintain the highest standards in managing your personal data.

This Privacy Policy will explain the types of data we collect, how our Company uses the personal data we collect from you, and the measures we take to ensure its security.

2. Definitions

Whenever used in the Privacy Policy the following terms shall have the meaning given to them below.

- a) **Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of personal data; where the purposes and means of such Processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
- b) **Data concerning health** means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status.
- c) **Destruction:** Destruction of data after expiry of its retention period means total irreversible destruction. On computer this will mean deleting from a file, from email box, from other files where a copy is kept, from all applications, withdrawing access rights granted if it was a shared document, going over to the other person with whom the document was shared and making sure they have also destroyed the document and, emptying the computer bin.
- d) **Electronic environment** means environments on which personal data can be created, read, modified, and written using electronic devices.
- e) **Erasure or deletion** means either the physical destruction (e.g. shredding), technical destruction (e.g. complete overriding of entire data media) and anonymization (modification of personal data that these can no longer be attributed to an identified or identifiable natural person).
- f) **Personal data** means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- g) **Physical environment** means all written, printed, visual, etc. environments other than electronic environments.
- h) **Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, retention, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- i) **Sensitive data** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

3. Personal Data

The Company processes personal data belonging to the employee candidates, visitors, persons who contact the Company such as representatives/employees of its suppliers, contractors and customers.

The types of personal data collected and processed by our Company vary depending on the nature of the legal relationship established with you. Accordingly, the categories of personal data gathered by our Company through various channels are outlined as follows:

- a) **Identity data**, such as name, surname, gender, birth date and other data the Company collects to verify the data subject's identification.
- b) **Contact data**, such as email address, address and phone number.
- c) **Commercial data**, which includes data related to orders, services and products, payments, invoices etc.
- d) **Recruitment data**, such as information provided in CV's and performance evaluation reports, ;.
- e) **Visual recordings**, such as photographs and camera recordings, also those recorded with CCTV cameras.
- f) **Other**, such as IP address, data that may be obtained during computer and telephone surveillance.

4. Collection of Personal Data

We collect your personal data through verbal, written or electronic environments, by automatic and non-automatic means; by electronic mail, fax, phone, SMS, mail, courier, the Company's website, social media accounts and other platforms, contracts, application forms, photo and video camera recordings. To be more specific, we may collect information about you through the following channels:

- a) You may provide us with information directly (e.g. filling in a form or making a call to us).
- b) We may collect information automatically when you interact with our systems, or we communicate with you.
- c) We may also acquire information from third parties (e.g. publicly available information on social media platforms, from our affiliates and subsidiaries).

5. Data Processing

The Company collects and processes personal data for the following purposes:

- a) In order to establish, maintain and develop business relationships with our commercial partners, our suppliers and our clients.
- b) To enter into contracts with our commercial partners, our suppliers and our clients.
- c) To conduct human resources processes including but not limited to recruitment and hiring processes, execution of regulatory obligations.
- d) To conduct accounting activities.
- e) To maintain the security of the Company facilities, monitoring entries and exits to and from the workplace,
- f) To comply with regulatory obligations.
- g) Where necessary or appropriate, to work in coordination with Yılport Holding A.Ş. and/or Yıldırım Holding Group Companies to which we are affiliated and to carry out reporting activities.
- h) Where necessary or appropriate, to ensure infrastructure and information security, and to integrate with Yılport Holding A.Ş. and/or Yıldırım Holding Group Companies processes in this context.
- i) To prepare, follow-up, exercise or respond to an administrative legal or judicial claim/proceeding, to enforce a judgement.

In this respect, the Company ensures that any Processing of personal data is in accordance with the GDPR and founded on a clear and justifiable legal basis according the GDPR. Accordingly, the Company processes personal data relying on different legal basis:

- a) If you have given consent to the Processing of your personal data.
- b) If Processing is necessary for the performance of a contract to which the data subject or its client/employer is party or in order to take steps at the request of the data subject prior to entering into a contract.
- c) If Processing is necessary for compliance with a legal obligation to which the Company is subject.
- d) If Processing is necessary in order to protect your vital interests or those of another person.
- e) If Processing is necessary for the performance of a task the Company carries out in the public interest or when it exercises an official authority.
- f) If Processing is necessary for the legitimate interests pursued by the Company or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms,

In relation to individual data subjects whose data the Company collects and processes, we process different categories of personal data based on various legal grounds, as further specified below:

5.1 Processing of Personal Data of Employee Candidates

The Company collects personal data about employee candidates during the recruitment process for the purposes of evaluating and finalizing the job applications. The categories of personal data include personal contact details such as name and surname, address and contact details, including email address and telephone number, date of birth, employment and education history including the qualifications and achievements of the applicant, and other information provided in the CV, diploma or any other documents disclosed by the applicant, candidate evaluations carried out in connection with the application process etcetera.

The personal data will be processed by the Company for the purposes above on the legal basis set out below:

- a) When Processing is necessary in the legitimate interests of the Company (except where those interests contradict or harm the interests or rights and freedoms of the individual).

Further details on how we process personal data and the legal basis for Processing personal data related to employee candidates are specified in the Employee Candidates (applicants) Information Notice attached hereto as Annex 1.

1. Processing of Personal Data of Representatives and/or Employees of Suppliers and Customers

For the purposes of conducting oral and written correspondence, supervision, and reporting activities with its suppliers and customers the Company process personal data of the suppliers and customers representatives and employees, such as name, surname and contact information (i.e. email address, telephone number). The Company retains such correspondence and the information to respond to inquiries, conduct communications and carry out operational activities.

The personal data will be processed by the Company for the purposes above on the legal basis set out below:

- a) When Processing is necessary for the performance of a contract with suppliers and customers.
- b) When Processing is necessary in the legitimate interests of the Company (except where those interests contradict or harm the interests or rights and freedoms of the individual).

Further details on how we process personal data and the legal basis for Processing personal data related to representatives and employees of suppliers and customers are specified in the Representatives of Suppliers and Customers Information Notice attached hereto as Annex 2.

5.2 Processing of Port Visitors Personal Data

The Company collects personal data of port visitors including name, surname, phone number and car registration number in order to manage access of visitors to the Gävle Hamn AB's premises and ensure security and safety on the premises. The personal data is transferred to Gävle Hamn AB and not stored by the Company.

The above-mentioned personal data is processed by the Company for the purposes above on the legal basis set out below:

- a) When Processing is necessary in the legitimate interests of the Company and Gävle Hamn AB (except where those interests contradict or harm the interests or rights and freedoms of the individual).

Further details on how we process personal data and the legal basis for Processing personal data related to port visitors are specified in the Information Notice for Port Visitors attached hereto as Annex 3.

5.3 Processing of Personal Data in connection with CCTV surveillance and recording

The Company uses CCTV cameras for surveillance and recording of its premises. CCTV cameras are installed in the Company's terminal areas (legitimate interest), quay walls (legal obligation) and container freight stations (legitimate interest). With these cameras only visual data is recorded and no auditory data (sound) is recorded.

Your personal data will be processed by the Company for the purposes above on the legal basis set out below:

- a) When Processing is necessary in the legitimate interests of the Company (except where those interests contradict or harm the interests or rights and freedoms of the individual).
- b) When Processing is necessary for compliance with a legal obligation to which the Company is subject.

Further details on how we process personal data and the legal basis for Processing personal data related to CCTV cameras are specified in the Camera Surveillance Act 2018:1200 and the CCTV Information Notice attached hereto as Annex 4.

6. Data Transfers

The Company acts in compliance with the basic principles and requirements of the GDPR in both cross-border and intra-EU/EEA data transfers. Any transfer of personal data which are undergoing Processing or are intended for Processing after transfer to a third country shall take place only if the conditions laid down in the GDPR are complied with, including for onward transfers of personal data.

In order to fulfill the objectives outlined in this Privacy Policy, we have to give access to your personal data to the third-party entities that help us in delivering services to you which includes third-party service providers located in the European Economic Area ("EEA"). We also transfer personal data to the public authorities, tax offices, notaries, and banks due to legal obligations.

The Company is an affiliate of Yılport Holding A.Ş., Türkiye, a global legal entity operating numerous ports and terminals across the world. Consequently, there are occasions where your personal data needs to be transferred to Yılport Holding A.Ş., Yıldırım Holding Group

Companies and group companies outside the EEA. In addition, it is possible that the servers of some third-party providers from which the Company obtains information technology services are located outside the EEA. Therefore, your personal data might need to be transferred to third countries.

Cross-border data transfers strictly adhere to mechanisms that guarantee an adequate level of protection, as required by Privacy Laws and other applicable regulations. In order for the personal data to be transferred to countries outside the EEA, the country to which the personal data will be transferred must be one of the countries that provide an adequate level of protection according to GDPR.

If the transferee country is not among the countries that provide an adequate level of protection, the Company may only transfer personal data, to the extent necessary or appropriate, based on binding corporate rules or standard contractual clauses published and/or approved by the European Commission.

In the absence of the above-mentioned conditions, cross-border data transfer may be made in the presence of the following exceptional circumstances by the GDPR:

- a) The data subject's informed and explicit consent.
- b) Existence of a contractual relationship where a cross-border transfer is necessary.
- c) The conclusion or execution of a contract between a Controller and a third party for the benefit of the data subject.
- d) Public interest.
- e) Establishing, exercising, or defending legal claims.
- f) In cases where the personal data subject is physically or legally unable to give consent, to protect the vital interests of the data subject.

Where none of these conditions apply and transfers cannot be based on an adequacy decision or appropriate safeguards, a transfer may only take place where it is necessary for the compelling legitimate interests of the Company, provided that it will not be continuous and concerns a limited number of data subjects.

7. Data Retention and Erasure

7.1 Retention of Personal Data

The Company processes and retains personal data for the purposes and based on the legal basis set out in Section 5 of this Privacy Policy.

7.2 Erasure of Personal Data

7.2.1 *Reasons of Erasure*

The Company destructs personal data without undue delay ex officio or upon the request of the data subject where one of the following grounds applies:

- a) The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- b) The data subject withdraws consent on which the Processing is based on, and there is no other legal ground for the Processing.
- c) The data subject objects to the Processing and there are no overriding legitimate grounds for the Processing.
- d) The personal data have been unlawfully processed.
- e) The personal data must be erased for compliance with a legal obligation to local law.

Where the Company has made the personal data public and is obliged to erase the personal data, the Company, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform Controllers which are Processing the personal data erased.

The Company shall not erase personal data if Processing is necessary:

- a) For exercising the right of freedom of expression and information.
- b) For compliance with applicable local rules including a legal obligation which requires Processing for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company.
- c) For reasons of public interest in the area of public health.
- d) For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the deletion is likely to render impossible or seriously impair the achievement of the objectives of that Processing.
- e) For establishment, exercise, or defense of legal claims.

7.2.2 *Right to Erasure (“Right to be Forgotten”)*

The data subject shall have the right to obtain from the Company information of the erasure of personal data concerning him or her without undue delay in accordance with the grounds and exemptions listed in Section 7.2.1 of this Policy.

The Company shall provide information on action taken on the request of erasure to the data subject without undue delay and in any event within 1 (one) month of receipt of the request. That period may be extended by 2 (two) further months where necessary, taking into account the complexity and number of the requests. The Company shall inform the data subject of any such extension within 1 (one) month of receipt of the request, together with the reasons for delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

If the Company does not act on the request of the data subject due to the exemptions set forth under Section 7.2.1 of this Privacy Policy, the Company shall inform the data subject without delay and at the latest within 1 (one) month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

Any actions taken shall be provided free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the Company may either; (i) charge a reasonable fee considering the administrative costs of erasure; or (ii) refuse to act on the request. The Company shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.

8. Security Measures

We process personal data applying necessary technical and organizational measures to ensure an appropriate level of security, to prevent unauthorized or unlawful Processing and access, as well as safeguarding against accidental loss, destruction, or damage. We employ suitable technical and organizational measures, as stipulated in the GDPR, to achieve this level of security.

Personal data processed by the Company are securely stored in physical environments such as unit cabinets, archives or electronic environments such as web-based platforms, internal document system filings, computers, data centers, and software.

The Company conducts requisite training for relevant personnel regarding personal data storage, erasures and undertakes periodic audits for the same.

9. Data Subject Rights

As a data subject interacting with the Company, you have the rights set out herein in accordance with the GDPR.

9.1 Revocation of Consent

If we process information about you based on your consent, you have the right to revoke your consent at any point in time. We will then terminate the Processing of the personal data that is based on your consent.

9.2 Right to Rectification

You are entitled to have inaccurate or incomplete personal data rectified or completed.

9.3 Right to Erasure (Right to be Forgotten)

You have the right to request the erasure of your personal data under circumstances specified in Section 7.2.2.

9.4 Right to Restriction of Processing

Under certain circumstances, you have the right to request the restriction of Processing of your personal data.

9.5 Right to Data Portability

Under certain circumstances, you have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format to transmit this data to another Controller, where technically feasible.

9.6 Right to Object

You have the right to object, on grounds relating to your particular situation, at any time to Processing of personal data concerning you which is based on legitimate interests, or the performance of a task carried out in the public interest or in the exercise of official authority.

9.7 Right to Access

You have the right to request information about the personal data we hold about you, including details about the purposes of Processing, the categories of personal data involved, and the recipients or categories of recipients to whom the personal data has been or will be disclosed.

9.7.1 *Data Subject Access Right*

Within the context of right to access, the data subjects have the right (i) to ask the Company if personal data about him or her are processed, (ii) to request access to their personal data and (iii) to request information about the Processing of their personal data including:

- a) The purposes of the Processing.
- b) The categories of personal data concerned.
- c) The recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations.
- d) The envisaged period for which the personal data will be stored, and the criteria used to determine that period.
- e) The existence of the right to request from the Controller rectification or erasure of personal data or restriction of Processing of personal data concerning the data subject or to object to such Processing.
- f) The right to lodge a complaint with a supervisory authority.
- g) Where the personal data are not collected from the data subject, any available information as to their source.
- h) The existence of automated decision-making, including profiling and
- i) Where the personal data are transferred to a third country or to an international organization, information on the appropriate safeguards relating to the transfer.

9.7.2 *Submitting Data Subject Access Requests*

For your data subject access requests, please fill in attached Annex 5, Data Subject Access Request Form and send to the contact address below:

Submission by e-mail: nordic.hr@yilport.com

Submission by post: Yilport Nordic, Stålgatan 1, 195 72 Rosersberg, Sweden

9.7.3 *Responding to Data Subject Access Requests*

Upon receipt of the data subject access request, the Company first evaluates whether the request concerns personal data; whether the request is a data subject access request submitted as per applicable rules and finally whether the data subject access request relates to the requesting person.

a) Identity Confirmation

In order to ascertain and confirm the identity of the data subjects exercising their rights granted by applicable Privacy Laws, the Company may use authentication procedures, ask additional questions to the requesting person or request the data subject to present some additional identification elements. In the event that data subject access request is made via third parties / proxies, the Company may demand appropriate documentation (such as powers of attorney) demonstrating authorization to make a request.

b) Information Gathering

If the information provided in your data subject access request is sufficient to compile your personal data, the Company collects all forms, whether hard-copy or electronic, throughout all IT systems and non-IT filing systems, and ensures the required information is presented in an appropriate format. The Company may ask for further information if adequate information to locate your records is needed.

c) Providing Access

Once all the information is gathered with respect to a data subject access request, the Company communicates the personal data and other relevant information requested in a concise, transparent, intelligible, and easily accessible form, using clear and plain language.

Where the Company does not process personal data relating to the data subject requesting the access, the information to be provided would be limited to confirming that no personal data relating to the data subject are being processed.

If the Company cannot comply with the request, the Company provides reasons as to why it cannot fulfil the request.

Where a request is received by electronic means, the Company provides the requested information in a commonly used electronic form (unless otherwise requested by the data subject). If the information is requested to be communicated by post, the Company sends a copy of the personal data to the data subject's postal address.

Whilst the information requested is usually provided without a fee, further copies requested may incur a charge to cover administrative costs.

d) Timing

The Company provides information to the data subject regarding action taken in respect of a data subject access request without undue delay and in any event within 1 (one) month of

receipt. This deadline can be extended by a maximum of 2 (two) months considering the complexity of the request and the number of requests.

9.7.4 *Limits and Restrictions of Data Subject Access Right*

If the Company considers that answering the access request will adversely affect the prevailing rights and freedoms of third parties, the Company may refrain from providing information. The Company may also override requests for the right of access that are manifestly unfounded or excessive. In these cases, the Company will inform the data subject of the concrete circumstances and reasons at the earliest convenience, or at the latest, within 1 (one) month of receipt of the request.

9.7.5 *Lodging Complaints*

If you consider that your request has been unlawfully or incompletely fulfilled, you have the right to lodge a complaint with the Swedish Authority for Privacy Protection (“**IMY**”).

Contact information for IMY:

Website: www.imy.se/en/
Address: Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm, Sweden
Phone Number: +46 (0)8 657 61 00
E-mail: imy@imy.se

10. Changes to the Privacy Policy

We reserve the right to modify this Privacy Policy periodically. Amendments to this Privacy Policy will take effect upon the publication of the revised version through our website. In the event of substantial changes, we will endeavor to notify the data subject through our website to the extent feasible and solicit the data subject’s consent where applicable.

11. How to Contact Us

For any questions or requests relating to this Privacy Policy, you may contact the Company via email: nordic.hr@yilport.com.

12. Annexes

The following Annexes are an integral part of this Privacy Policy:

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| Annex 1: | Employee Candidates (applicants) Information Notice |
| Annex 2: | Representatives of Suppliers and Customers Information Notice |

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| Annex 3: | Information Notice for Port Visitors |
| Annex 4: | CCTV Information Notice |
| Annex 5: | Data Subject Access Request Form |

ANNEX 1

EMPLOYEE CANDIDATES / (APPLICANTS) INFORMATION NOTICE

This document provides information on how Yilport Sweden Terminal Investments AB, company registration number 556967-4608, a Yilport Holding A.Ş. group company, and its group companies', including Yilport Gävle AB, company registration number 559007-6898, and Yilport Sweden Logistics AB, company registration number 556937-5008, (jointly the “**Company**”), collects and uses personal information during the recruitment process, in accordance with applicable Privacy Laws.

You may find further information on the purposes of processing your personal data by the Company with the Yilport Sweden Terminal Investments AB Privacy Policy available at the corporate website <https://yilport.com/en/>.

1. Contact Details

Address: Yilport Nordic, Stålgatan 1, 195 72 Rosersberg, Sweden

Email: Nordic.hr@yilport.com

Contact Person: Ulrika von Wachenfeldt

2. Personal Data Processing Purposes and Legal Grounds

The Company processes the following categories of personal data about candidates through the recruitment process for the purposes of evaluating and finalizing the job applications, and collects them directly from the candidates *(i)* when they apply for a role with the Company via recruitment platforms or through e-mail; *(ii)* during interviews conducted physically within the Company premises or electronically via online meeting platforms; or *(iii)* from third party service providers who provide assistance for recruitment and headhunting:

- a) Personal contact details such as name and surname.
- b) Address and contact details, including email address and telephone number.
- c) Date of birth.
- d) Employment and education history including the qualifications and achievements of the applicant, and other information provided in the CV, diploma or any other documents disclosed by the applicant.
- e) Candidate evaluations carried out in connection with the application process.
- f) Any information that may be required due to legal requirements (e.g. residence or work permits).
- g) Test results and internal evaluations.
- h) Other categories of data that you voluntarily decide to share with us.

Your personal data will be processed by the Company in light of the purposes above on the legal basis set out below, within the scope of the personal data processing conditions regulated under the GDPR.

Processing is necessary in the legitimate interests of the Company (except where those interests contradict or harm the interests or rights and freedoms of the individual).

- a) To organize and conduct interviews.
- b) To communicate with the applicants during their candidacy, including requests for additional information if required.
- c) To carry out testing and assessment hereof for clarifying if the applicant has a suitable profile for the position(s).
- d) To evaluate and finalize the submitted job application.

- e) To protect the Company's legal rights to the extent authorized or permitted by law.

3. To Whom Your Personal Data is Transferred and For What Purposes

The Company is an affiliate of Yılport Holding A.Ş., Türkiye, an international container terminal operator that has operations in many countries. Consequently, there are occasions where your personal data is transferred outside the EEA, to Yılport Holding A.Ş., in order to ensure reporting and organizational integration between group companies by complying with the requirements under the GDPR to fulfil the purposes stated in Section 2.

The Company obtains e-mail, cloud solution and information technology infrastructure services from third parties and Yılport Holding A.Ş. Therefore, personal data that the Company collects may be stored in a different country than where you are located including the EEA or within the Republic of Türkiye. As a result, your personal data may be transferred outside the EEA.

The Company may transfer personal data to its parent company Yılport Holding A.Ş., Turkey, using standard contractual clauses as transfer mechanism. Standard contractual clauses are a set of contract terms approved by the European Commission for cross-border transfer of personal data to countries or regions that do not offer a protection equivalent to the GDPR.

During such transfer, the Company takes appropriate and adequate security measures to ensure the confidentiality of your personal data.

4. Data Storage, Retention and Erasure

The Company processes personal data for a period required by statutory law. If no such period is regulated under applicable law, the personal data will be processed for 1 year after submission. Personal data will be erased within 3 months after the processing period/receipt of a feasible request of the data subject.

5. Your Rights as Data Subject

The GDPR provides certain rights for data subjects as described in the Privacy Policy.

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ANNEX 2

REPRESENTATIVES OF SUPPLIERS AND CUSTOMERS INFORMATION NOTICE

This document provides information on how Yilport Sweden Terminal Investments AB, company registration number 556967-4608, a Yilport Holding A.Ş. group company, and its group companies', including Yilport Gävle AB, company registration number 559007-6898, and Yilport Sweden Logistics AB, company registration number 556937-5008, (jointly the “**Company**”), collects and uses personal information provided by representatives or contact persons of the suppliers and customers, in accordance with applicable Privacy Laws.

You may find further information on the purposes of processing your personal data by the Company with the Yilport Sweden Terminal Investments AB Privacy Policy available at the corporate website <https://yilport.com/en/>.

1. Contact Details

Address: Yilport Nordic, Stålgatan 1, 195 72 Rosersberg, Sweden

Email: Nordic.hr@yilport.com

Contact Person: Ulrika von Wachenfeldt

2. Personal Data Processing Purposes and Legal Grounds

Your name, surname, contact information (i.e. email address, telephone number), company information and communication content are collected directly from you, through our supplier, clients or service provider and/or electronically via email and other electronic media for the purposes of conducting oral and written correspondence, supervision, and reporting activities. The Company retains such correspondence and the information contained in it to respond to your inquiry, conduct communications and carry out operational activities.

Your personal data will be processed by our Company in light of the purposes above on the legal basis set out below, within the scope of the personal data processing conditions regulated under the GDPR.

Processing is necessary to carry out a contract to which the data subject's client/employer is a party or to take steps at the request of the data subject before entering into a contract.

- a) To manage our suppliers and service providers.
- b) To offer our services to our customers, and to facilitate the delivery of the services.
- c) To obtain products and services from our suppliers.
- d) To conduct transactions before banks, auditors, and invoicing activities.
- e) To prevent fraud or criminal activity, misuse of our services.

Processing is necessary in the legitimate interests of the Company (except where those interests contradict or harm the interests or rights and freedoms of the individual).

- a) To evaluate and finalize your inquiry.
- b) To execute and ensure compliance with Yilport Holding Group policies and processes.
- c) To manage our suppliers and service providers.
- d) To monitor our facilities to ensure compliance with applicable policies and laws.
- e) To preserve our economic interests and ensure compliance (e.g., complying with our policies and legal requirements, tax and deductions, managing alleged cases of misconduct or fraud, conducting audits and participating in litigation).
- f) To preserve our legal interests (e.g., managing mergers and acquisitions involving our company, enforcing or defending our legal rights).

- g) Archiving and record-keeping.
- h) Billing and invoicing.

3. To Whom Your Personal Data is Transferred and For What Purposes

Your personal data may be shared with the Company's business partners, third-party service providers, suppliers, clients, authorized public institutions within the European Union/European Economic Area ("EEA") by complying with the requirements under the GDPR to fulfil the purposes stated in Section 2. During such transfer, the Company takes appropriate and adequate security measures to ensure the confidentiality of your personal data.

The Company is an affiliate of Yılport Holding A.Ş., Türkiye, an international container terminal operator that has operations in many countries. Consequently, there are occasions where your personal data is transferred outside the EEA, to Yılport Holding A.Ş., to ensure reporting and organizational integration between group companies by complying with the requirements under the GDPR to fulfil the purposes stated in Section 2. During such transfer the Company takes appropriate and adequate security measures to ensure the confidentiality of your personal data.

Moreover, the Company obtains e-mail, cloud solution and information technology infrastructure services from third parties and Yılport Holding A.Ş. Therefore, personal data that the Company collects may be stored in a different country than where you are located including the EEA or within the Republic of Türkiye. As a result, your personal data may be transferred outside the EEA.

The Company may transfer personal data to its parent company Yılport Holding A.Ş., Turkey, using standard contractual clauses as transfer mechanism. Standard contractual clauses are a set of contract terms approved by the European Commission for cross-border transfer of personal data to countries or regions that do not offer a protection equivalent to the GDPR.

4. Data Storage, Retention and Erasure

The Company processes personal data for a period required by statutory law. If no such period is regulated under applicable law, the personal data will be processed while necessary for fulfilling the purpose of the processing. Personal data will be erased within 3 months after the processing period/receipt of a feasible request of the data subject.

5. Your Rights as Data Subject

The GDPR provides certain rights for data subjects as described in the Privacy Policy:

ANNEX 3

INFORMATION NOTICE FOR PORT VISITORS

This document provides information on how Yilport Sweden Terminal Investments AB, company registration number 556967-4608, a Yilport Holding A.Ş. group company, and its group companies', including Yilport Gävle AB, company registration number 559007-6898, and Yilport Sweden Logistics AB, company registration number 556937-5008, (jointly the "**Company**"), collects and uses personal data during your visit to the Company's premises, in accordance with applicable Privacy Laws.

You may find further information on the purposes of processing your personal data by the Company with the Yilport Sweden Terminal Investments AB Privacy Policy available at the corporate website <https://yilport.com/en/>.

1. Contact Details

Address: Yilport Nordic, Stålgatan 1, 195 72 Rosersberg, Sweden

Email: nordic.hr@yilport.com

Contact Person: Ulrika von Wachenfeldt

2. Personal Data Processing Purposes and Legal Grounds

The Company collects personal data of the visitors including name, surname, phone number and car registration number in order to manage access of visitors to the Gävle Hamn premises and ensure security and safety on the premises.

The above-mentioned personal data is processed by the Company in light of the purposes above on the legal basis set out below, within the scope of the personal data processing conditions regulated under Article 6 and 7 of the GDPR.

Processing is necessary in the legitimate interests of the Company and Gävle Hamn AB (except where those interests contradict or harm the interests or rights and freedoms of the individual)

- a) To manage access of the visitors to the premises.
- b) To ensure security and safety on the premises.

3. To Whom Your Personal Data is Transferred and For What Purposes

The personal data the Company collects are transferred to Gävle Hamn AB which will be the controller of the Processing of your Personal Data.

Please refer to <https://gavlehamn.se/integritetspolicy/> for further information on how Gävle Hamn AB processes your personal data.

4. Data Storage, Retention and Erasure

The Company does not store your personal data but Processes it only as long as is required to transfer it to Gävle Hamn AB.

5. Your Rights as Data Subject

The GDPR provides certain rights for data subjects as described in the Privacy Policy.

ANNEX 4

CCTV INFORMATION NOTICE

This document provides information on how Yilport Sweden Terminal Investments AB, company registration number 556967-4608, a Yilport Holding A.Ş. group company, and its group companies', including Yilport Gävle AB, company registration number 559007-6898, and Yilport Sweden Logistics AB, company registration number 556937-5008, (jointly the “**Company**”), collects and uses personal information through the closed-circuit television camera system (“**CCTV**”), in accordance with applicable Privacy Laws and the Camera Surveillance Act 2018:1200.

1. Contact Details

Address: Yilport Nordic, Stålgatan 1, 195 72 Rosersberg, Sweden

Email: nordic.hr@yilport.com

Contact Person: Ulrika von Wachenfeldt

2. Personal Data Processing Purposes and Legal Grounds

The Company uses CCTV cameras, which are installed in its terminal areas, quay walls and container freight stations. With these cameras **only** visual data is recorded and no auditory data (sound) is recorded.

Your personal data will be processed by the Company in accordance with the Camera Surveillance Act 2018:1200 and considering the purposes and legal basis set out below, within the scope of the personal data processing conditions regulated under the GDPR and local data protection laws, if applicable.

Processing is necessary for compliance with a legal obligation to which the Company is subject:

- a) To comply with the ISPS Code.
- b) To monitor automated operations.
- c) To ensure the legal, technical and commercial security of the people in the premises.
- d) To ensure the physical security of the premises.
- e) To ensure occupational health and safety.
- f) To comply with legal obligations.
- g) To follow up on inquiries/complaints.

Processing is necessary in the legitimate interests of the Company (except where those interests contradict or harm the interests or rights and freedoms of the individual):

- a) To detect and obtain evidence of possible illegalities,
- b) To ensure the security of fixtures in the premises,
- c) To protect the Company's legal rights to the extent authorized or permitted by law.

3. To Whom Your Personal Data is Transferred and For What Purposes

Your personal data obtained by the Company will be shared with legally authorized public institutions in Sweden and/or the European Union/European Economic Area (“**EEA**”) by complying with the requirements under the GDPR and/or the other applicable personal data protection legislation to fulfil the purposes stated in Section 2. During such transfer, the Company takes appropriate and adequate security measures to ensure the confidentiality of your personal data.

The Company may transfer personal data to its parent company Yilport Holding A.Ş., Turkey, using standard contractual clauses as transfer mechanism. Standard contractual clauses are a set of contract terms approved by the European Commission for cross-border transfer of personal data to countries or regions that do not offer a protection equivalent to the GDPR.

4. Data Storage, Retention and Erasure

The Company processes personal data for a period required by statutory law. If no such period is regulated under applicable law, the personal data will be processed for 30 days after recording and, regarding footage related to claims, 3 months or until a claim is settled. Personal data will be erased within 3 months after the processing period/receipt of a feasible request of the data subject.

5. Your Rights as Data Subject

The European Union's General Data Protection Regulation and other countries' privacy laws provide certain rights for data subjects as described in the Privacy Policy.

The Company's policy with detailed information on the processing and protection of personal data is available on our websites <https://yilport.com/en/ports/default/G%C3%A4vle-Nordic-Terminals/87/0/0>.

Annex 5 to Privacy Policy – Data Subject Access Request Form

| | | | |
|---|-------|-----------------------|--|
| 1. Information on Requesting Person | | | |
| Name: | | Date of Birth: | |
| Phone: | | E-mail: | |
| Address: | | | |
| <p><i>*If the Company cannot safely identify the data subject from the information submitted in the Request Form, the Company may ask you to supply additional information to prove your identity. If the additional information received is insufficient to remove doubt, we may refuse to grant your request.</i></p> | | | |
| 2. Third Party Information | | | |
| If you are making a data subject access request on behalf of someone else, please fill in the fields below. | | | |
| Name: | | Date of Birth: | |
| Phone: | | E-mail: | |
| Address: | | | |
| What is your relationship to the person whose information you're requesting? | | | |
| I confirm that I am the authorized representative of the named data subject: | | | |
| Representative's Name: | _____ | | |
| Signature: | _____ | | |
| <p><i>*Please supply us with photocopy or scanned image of a document proving your authorization.</i></p> | | | |
| 3. Information Requested | | | |
| Please provide detailed specifics in your request. This precision will enable us to promptly address your inquiry and facilitate your search for the desired information. | | | |
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| |
| I declare that, to the best of my knowledge and belief, the information I supplied is accurate and comprehensive. I acknowledge that furnishing inaccurate or incomplete information may result in a delay or rejection of my request. |
| Signature: |
| Name: |
| Date: |