

DATA PROTECTION POLICY

This Data Protection Policy sets out the principles and practices adopted by SOLID MADENCİLİK SANAYİ VE TİCARET LİMİTED ŞİRKETİ (“SOLID”) in relation to the collection, processing, storage, and retention of personal data obtained as part of the counterparty onboarding process.

The purpose of this Policy is to ensure that SOLID and its affiliates comply with applicable data protection, trade control, anti-money laundering, anti-bribery and corruption regulations, while protecting the privacy and rights of individuals whose personal data is processed.

1. SCOPE

This Policy applies to:

- SOLID MADENCİLİK SANAYİ VE TİCARET LİMİTED ŞİRKETİ (registration no: 304635-5)
- Its holding company, subsidiaries, and affiliates within the group of companies
- Any branch or representative office of SOLID, unless explicitly excluded by law

2. DATA CONTROLLER

The entity responsible for processing personal data is:

SOLID MADENCİLİK SANAYİ VE TİCARET LİMİTED ŞİRKETİ

Maslak Mahallesi, Meydan Sokak, VEKO GİZ Plaza No.3/27, Sarıyer, İstanbul, Türkiye

3. PURPOSE OF DATA PROCESSING

Personal data is processed for the following purposes:

- Compliance with legal and regulatory obligations
- Conducting due diligence on counterparties
- Protecting SOLID’s assets, employees, and contractors
- Ensuring adherence to trade control, anti-money laundering, anti-bribery, and anti-corruption laws

4. SOURCES OF PERSONAL DATA

Personal data may be collected from:

- Individuals completing registration or onboarding forms
- Employing or engaging companies of such individuals
- Publicly available or government-issued sanctions lists
- Reputable media and compliance sources

5. CATEGORIES OF PERSONAL DATA PROCESSED

The following categories of personal data may be processed:

- Proof of identity and address (e.g., passports, national identification documents, utility bills)
- Information required to undertake due diligence, including but not limited to:
 - o Directorships held
 - o Shareholdings in counterparties or affiliates

SOLID MADENCİLİK SANAYİ VE TİCARET LİMİTED ŞİRKETİ

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6. DATA RETENTION

Personal data collected for onboarding and compliance purposes is retained for the duration of the contractual relationship. After termination, data will be stored for a period not exceeding five (5) years, unless longer retention is required by law or regulatory authorities. Once the retention period has expired, personal data will be securely deleted or anonymised.

7. DATA SECURITY

SOLID applies appropriate technical and organisational measures to ensure the confidentiality, integrity, and availability of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage.

8. DATA SUBJECT RIGHTS

Individuals whose personal data is processed by SOLID are entitled to exercise their rights under applicable data protection laws, including:

- The right to access personal data
- The right to request rectification or deletion
- The right to object to processing in specific circumstances
- The right to lodge a complaint with competent supervisory authorities

9. QUERIES AND COMPLAINTS

Any queries or concerns regarding the processing of personal data may be directed to: compliance@solidmaden.com

10. POLICY REVIEW

This Policy will be reviewed periodically to ensure ongoing compliance with evolving legal and regulatory requirements and to reflect any changes in SOLID's operational practices.