01.06. 2026

INFORMATION SECURITY POLICY

As SUMMA Turizm Yatırımcılığı A.Ş., we adopt the protection of all our information assets in accordance with the principles of confidentiality, integrity, and availability as a fundamental approach to ensuring the sustainability of our operations and safeguarding our corporate reputation.

Our Company places great importance on protecting the corporate and personal data of our employees, customers, suppliers, and other relevant parties. Accordingly, we conduct all activities related to the processing, storage, transfer, and destruction of personal data in compliance with applicable legislation, particularly the Personal Data Protection Law No. 6698 and related regulations and implement the necessary technical and administrative measures to ensure the security of personal data.

To effectively manage information security risks, we regularly assess the threats, vulnerabilities, and potential impacts affecting our information assets and plan and implement the necessary controls to reduce risks to acceptable levels. We continuously review our risk management activities to adapt to changing business needs, technological developments, and the evolving threat landscape.

We ensure that access to information systems and information assets is granted only to individuals authorized in line with their duties and responsibilities. We manage authorization processes in accordance with the principles of segregation of duties and least privilege and regularly review access rights to prevent unauthorized access.

To prevent information security incidents and breaches, we implement appropriate technical and organizational measures and adopt an effective incident management approach to ensure that security incidents are detected, reported, analyzed, and mitigated in a timely manner. We carry out continual improvement activities by using lessons learned from incidents to prevent their recurrence.

We conduct our information security practices in an integrated manner with the Company's Business Continuity Policy and Business Continuity Management System. Within the scope of our Business Continuity processes, we establish, regularly test, and maintain business continuity and information technology continuity plans to ensure the sustainability of critical business processes. In the event of disasters, cyberattacks, system failures, or other disruptions, we aim to maintain our services within acceptable timeframes and restore normal operations as quickly as possible.

We adopt compliance with all applicable legal, regulatory, and contractual requirements as a fundamental principle. We monitor national and international information security legislation, customer requirements, and industry obligations and implement the necessary measures accordingly.

We believe that information security can only be achieved through not only technological solutions but also the conscious participation of our employees. Therefore, we conduct regular awareness training, support the adoption of a strong security culture throughout the organization, and encourage all employees to contribute to the effectiveness of the Information Security Management System.

Within the scope of the Information Security Management System, we establish measurable information security objectives aligned with our corporate strategy and business goals, regularly monitor and evaluate their achievement, and support the provision of the necessary resources while ensuring that performance results are reviewed by management.

As SUMMA Turizm Yatırımcılığı A.Ş., we embrace the principle of continual improvement of the effectiveness of the ISO/IEC 27001 Information Security Management System.

This Policy is supported by the Information Technology Procedures. It enters into force upon approval by the Board of Directors and shall be reviewed and revised whenever necessary.

Chairman of the Board of Directors
Selim Bora