

PERSONAL DATA STORAGE, DESTRUCTION, AND ANONYMIZATION POLICY

PURPOSE:

As ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ., we attach great importance to the protection of personal data belonging to all individuals with whom we come into contact during our commercial activities, starting from the effective date of the Law No. 6698 on the Protection of Personal Data ('KVKK' or 'Law'). This **Personal Data Storage, Destruction, and Anonymization Policy** ('Policy') has been prepared to inform you about the processes and principles of collecting, using, sharing, storing, deleting, destroying, and anonymizing personal data by ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ.

This Policy outlines the principles regarding the processing of personal data belonging to data subjects by ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ., in accordance with the regulations set forth in the Law on the Protection of Personal Data ('KVKK'). These explanations cover ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. employees, active and potential customers, visitors, and other individuals who have a relationship with ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ.

In accordance with the Regulation, ÇAKIR İNŞAAT İTH.İHR.SAN.VE TİC.LTD.ŞTİ., as a Data Controller obligated to register with the Registry, is obliged to prepare a Policy for storing the personal data under its responsibility in accordance with the personal data inventory and to act in compliance with this Policy when necessary for deletion, destruction, or anonymization.

The following principles will apply to the storage and destruction of personal data:

- a)** The general principles stated in Article 4 of the Law will be followed.
- b)** ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. acknowledges that merely preparing this Policy does not imply that personal data is automatically deleted, destroyed, or anonymized in compliance with the Regulation, Law, and relevant legislation.
- c)** ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. acknowledges, declares, and undertakes to comply with the security measures specified in Article 12 of the Law, the provisions of the relevant legislation, the decisions to be taken by the Personal Data Protection Board, and this Policy when storing, deleting, destroying, or anonymizing personal data.
- d)** ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. undertakes to ensure compliance with this Policy and the tools, programs, and processes that will be applied in connection with this Policy when deleting, destroying, or anonymizing personal data, whether fully or partially automated or processed through non-automated means that are part of any data recording system.

2. SCOPE

This Policy applies to all processes of ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ.

PERSONAL DATA STORAGE, DESTRUCTION, AND ANONYMIZATION POLICY

3. DEFINITIONS

The Law	It is the Law No. 6698 on the Protection of Personal Data.
Regulation	It is the Regulation on Deletion, Destruction, or Anonymization of Personal Data.
Board	It is the Personal Data Protection Board.
Record Environment	It is called any environment where personal data, whether completely or partially processed by automatic means or non-automatic means as part of any data recording system, is processed.
Personal Data Processing Inventory	The inventory created and detailed by associating the personal data processing activities carried out by data controllers within the scope of their business processes with the purposes of processing personal data, data category, recipient group, and data subject group.
Destruction	The deletion, destruction, or anonymization of personal data.
Periodic Destruction	When all the processing conditions specified in the law cease to exist, it is the deletion, destruction, or anonymization of personal data, which will be carried out automatically at regular intervals as stated in the data retention and disposal policy.
Registry	It is the Registry of Data Controllers maintained by the Presidency.
Data Recording System	It is the record system where personal data is processed based on specific criteria.
Data Controller	It is the natural or legal person responsible for determining the purposes and means of processing personal data, and for establishing and managing the data recording system.
Recipient Group	The category of individuals or legal entities to whom personal data is transferred by the data controller.

PERSONAL DATA STORAGE, DESTRUCTION, AND ANONYMIZATION POLICY

Related User	They are the individuals processing personal data within the data controller's organization or individuals processing personal data based on the authority and instructions received from the data controller, excluding the person or unit responsible for the technical storage, protection, and backup of the data.
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The definitions contained in the Personal Data Protection Policy are applicable within this Policy.

5. REFERENCES

Law No. 6698 on the Protection of Personal Data

Regulation on the Deletion, Destruction, or Anonymization of Personal Data

Regulation on the Data Controllers Registry and other relevant regulations

6. PROCEDURES AND PRINCIPLES REGARDING THE PROTECTION OF PERSONAL DATA

6.1. GENERAL PRINCIPLES REGARDING PROCESSING

ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. processes personal data in compliance with the procedures and principles stipulated in the KVKK (Law on Protection of Personal Data) and other relevant laws. Within this framework, full compliance with the following principles outlined in the KVKK is ensured when processing personal data by ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ.

Compliance with the law and integrity: In accordance with this principle, ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. conducts its data processing processes within the limits required by the Constitution, the KVKK (Law on Protection of Personal Data), and all relevant legislation, as well as the rules of integrity.

Accuracy and being up-to-date: Necessary measures are taken by ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. to ensure that the personal data processed is accurate and up-to-date. Information is provided to data subjects to reflect the real situation of the processed data, and data subjects are given the necessary opportunities for this purpose.

Processed for specific, explicit, and legitimate purposes: ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. processes personal data only for specific, explicit, and legitimate purposes, and does not engage in data processing activities outside these purposes. In this context, ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. processes personal data only when necessary in connection with the business relationship established with data subjects.

Relevant, limited, and proportionate to the purposes for which they are processed: Data processed by ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. are processed in a

PERSONAL DATA STORAGE, DESTRUCTION, AND ANONYMIZATION POLICY

manner that is relevant, limited, and proportionate to the purposes determined based on data categories, in compliance with the KVKK and related legislation. Personal data that is not necessary for the intended purposes is avoided from being processed.

Retention for the period prescribed in the relevant legislation or as long as necessary for the purpose for which they are processed: Personal data processed by ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. is retained for the period prescribed in the relevant legislation or as long as necessary for the purpose for which they are processed. In this context, ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. complies with the retention period specified in the relevant legislation if applicable; if there is no such period specified, the data is retained only for the period necessary for the purpose for which they are processed. ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. does not retain data based on the possibility of future use.

6.2. CONDITIONS FOR PROCESSING PERSONAL DATA

The processing conditions of personal data are regulated by the Law on the Protection of Personal Data (KVKK), and ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. processes personal data in compliance with the conditions stated below. Except for the exceptions listed in the Law, ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. processes personal data only with the explicit consent of the data subjects. However, in the presence of the situations listed in the Law below, personal data can be processed even without the explicit consent of the data subject.

Explicitly prescribed by laws

Necessity to protect the life or physical integrity of the data subject or another person where the data subject is physically or legally incapable of giving consent due to impossibility,

Processing of personal data is necessary for the establishment or performance of a contract, provided that it is directly related to the parties to the contract,

Necessity of processing for compliance with a legal obligation to which the data controller is subject,

Data subject's personal data being manifestly made public by the data subject,

Processing is necessary for the establishment, exercise, or defense of legal claims,

Processing is necessary for the purposes of the legitimate interests pursued by the data controller or a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject,

In the processing of special categories of personal data, which are believed to be of critical importance from various aspects for the protection of data subjects, ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. exercises special care. In this context, such data are not processed without the explicit consent of the data subjects, provided that adequate measures determined by the Board are taken. However, special categories of personal data other than data related to health and sexual life can be processed without the explicit consent of the data subject in cases foreseen by the laws. Moreover, data related to health

PERSONAL DATA STORAGE, DESTRUCTION, AND ANONYMIZATION POLICY

and sexual life can be processed without obtaining explicit consent, provided that adequate measures are taken and in the presence of the reasons listed below:

Public health protection,

Preventive medicine,

Medical diagnosis,

Execution of treatment and care services,

Planning and management of healthcare services and financing.

6.3. PURPOSES OF PROCESSING PERSONAL DATA

The personal data obtained by ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. may be processed within the scopes described below.

Human resources operations,

Creation of employee personnel files, payroll,

Management of employee contract processes,

Execution of insurance renewal processes,

Provision of health services to employees,

Maintenance of blood type lists,

Allocation of vehicles, phones, and lines to employees within the scope of employment contract performance,

Execution of power of attorney and signature circular supply processes,

Conducting compliance assessments under subcontracting,

Conducting emergency preparedness and operations,

Execution of occupational health and safety processes,

Accident and legislation management within the scope of occupational health and safety,

Structuring of service procurement contract processes,

Planning, auditing, and execution of information security processes,

Creation and authorization of email accounts for employees,

Keeping internet log records,

Planning and execution of corporate communication activities,

Planning of employee travels and execution of advance processes,

PERSONAL DATA STORAGE, DESTRUCTION, AND ANONYMIZATION POLICY

Execution and tracking of document transactions,
Creation of card and service records for employee entries,
Continuity of budgeting processes,
Provision and management of personnel trainings,
Planning and execution of in-house training and orientation programs,
In-house operations,
Legal, technical, and administrative activities with consequences,
Strategy, planning, and management of business partners/suppliers,
Planning and execution of corporate communication activities and events,
Planning and execution of in-house training programs,
Customer Relationship Management,
Social Media Cookie Management.

The categories mentioned above are for informational purposes and additional categories may be added by us for ÇAKIR İNŞAAT İTH.İHR.SAN.VE TİC.LTD.ŞTİ.'s future commercial and operational activities. In such cases, ÇAKIR İNŞAAT İTH.İHR.SAN.VE TİC.LTD.ŞTİ. will continue to update the relevant texts to inform you promptly for the purpose of keeping you informed.

6.4. STORAGE OF PERSONAL DATA

Your personal data is securely stored in physical or electronic format for the periods prescribed by relevant legislation.

6.5. TRANSFER OF PERSONAL DATA TO INDIVIDUALS WITHIN THE COUNTRY

ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. complies meticulously with the conditions regulated in the Law on the Protection of Personal Data (KVKK) regarding the sharing of personal data with third parties, while other provisions in the laws are reserved. In this context, personal data is not transferred to third parties by ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. without the explicit consent of the data subject. However, personal data may be transferred by ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. without obtaining the explicit consent of the data subject if one of the conditions specified by the KVKK is met.

Explicitly prescribed by laws,

Necessity to protect the life or physical integrity of the data subject or someone else when the data subject is unable to express their consent due to actual impossibility or lack of legal validity of their consent,

The processing of personal data belonging to the parties of a contract being necessary, provided that it is directly related to the establishment or performance of a contract,

PERSONAL DATA STORAGE, DESTRUCTION, AND ANONYMIZATION POLICY

Necessity of processing for the compliance with a legal obligation to which the data controller is subject,

Data subject has made the personal data public,

Processing is necessary for the establishment, exercise, or defense of legal claims,

Processing is necessary for the purposes of the legitimate interests pursued by the data controller or a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject,

Subject to the necessary precautions being taken; processing is required for the purposes of the prevention of crime or the fulfilment of the obligations of personal data controller in the field of preventive medicine, medical diagnosis, the provision of care or treatment, or the management of health care services and planning,

Protection of public health,

Preventive medicine,

Medical diagnosis,

Provision of treatment and care services,

Your personal data can be transferred without obtaining explicit consent for purposes such as planning and managing healthcare services and financing.

In the transfer of special categories of personal data, compliance with the conditions specified for the processing of these data is ensured.

6.6. TRANSFER OF PERSONAL DATA ABROAD

Regarding the transfer of personal data abroad, explicit consent of the data subject is required in accordance with Article 9 of the Personal Data Protection Law (KVKK). However, in the presence of conditions permitting the processing of personal data, including sensitive personal data, without the explicit consent of the data subject, personal data may be transferred abroad by ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. without the explicit consent of the data subject, provided that there is adequate protection in the country where the personal data will be transferred. If the country to which the transfer will be made is not determined by the Board as a country providing adequate protection, ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. and the relevant data controller/data processor in that country will provide written assurances of adequate protection.

6.7. RIGHTS UNDER ARTICLE 11 OF LAW NO. 6698 ON THE PROTECTION OF PERSONAL DATA

You have the following rights in accordance with Article 11 of Law No. 6698 on the Protection of Personal Data, which you can exercise by applying to our company:

- a) To learn whether your personal data is being processed,
- b) If your personal data is processed, to request information regarding this,

PERSONAL DATA STORAGE, DESTRUCTION, AND ANONYMIZATION POLICY

- c) To learn the purpose of processing personal data and whether they are used for their intended purpose,
- d) To know the third parties in the country or abroad to whom personal data is transferred,
- e) To request the correction of personal data if it is incomplete or incorrectly processed,
- f) To request the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of the Law,
- g) To request the notification of the transactions made pursuant to items (e) and (f) above to the third parties to whom the personal data has been transferred,
- h) To object to the occurrence of a result against you due to the analysis of the processed data exclusively through automated systems,
- i) To request the compensation for damages in case of suffering damage due to the unlawful processing of personal data.

Data subjects can exercise the aforementioned rights by submitting a signed copy of the data subject application form, which is annex number 1 to this Policy, to the contact addresses of ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. via mail, email, or registered mail. Detailed information about filling out the form and sending it to ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. is provided in the application form included in annex number 1.

ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. will respond to the relevant applications physically or electronically and, depending on the nature of the request, will conclude the request as soon as possible and at the latest within thirty (30) days free of charge. However, if the transaction requires an additional cost, ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. will charge the fees specified in the tariff determined by the Board. Moreover, during the process of handling data subjects' requests, ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. may request additional information or documents from the applicants.

6.8. PRECAUTIONS TAKEN FOR DATA SECURITY

ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. takes all necessary technical and administrative measures to ensure the appropriate level of security required for the protection of personal data. The precautions prescribed in Article 12(1) of the Law on the Protection of Personal Data (KVKK) are as follows:

Preventing the unlawful processing of personal data,

Preventing unauthorized access to personal data,

Ensuring the preservation of personal data.

6.9. PROCESSING OF VIDEO RECORDINGS

ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. captures video recordings of visitors, employees, and other relevant individuals in line with the fundamental principles outlined in the Personal Data Protection Law (KVKK) and included in this Policy, aiming to ensure the

PERSONAL DATA STORAGE, DESTRUCTION, AND ANONYMIZATION POLICY

general and commercial security of the company's facilities and operations. These recordings are securely stored in physical or electronic format for a specific period of time in accordance with the purposes of processing. Visible notices indicating the recording of video footage are displayed in areas where video recordings are made, for the purpose of informing the data subjects. Within the scope of these activities, ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. complies with all obligations stipulated in relevant legislation, including the KVKK, regarding the protection of personal data. In places where privacy is highly valued, no video surveillance is conducted.

7. DELETION, DESTRUCTION, AND ANONYMIZATION OF YOUR PERSONAL DATA

Your personal data processed for the purposes specified in this Personal Data Protection Policy will be deleted, destroyed, or anonymized by us when the purpose requiring processing under Article 7/1 of Law No. 6698 ceases to exist, and after the periods specified by the laws have expired.

7.1. Deletion of Personal Data

Complete or partial deletion of personal data processed through automated means refers to the process of making the relevant personal data inaccessible and unusable by any means. The data controller explains how the conditions specified in the third paragraph are met for personal data to be considered deleted in its relevant policies and procedures. Deletion of personal data that is part of any data recording system and processed through non-automated means;

The process of anonymizing unnecessary personal data transferred in paper form through scanning or digitization into electronic environment will be performed when ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. processes data entirely or through automated means. In cases where ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. deletes personal data, the data must be made inaccessible and unusable in any way. ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. must ensure that the data is not accessible or usable by any user when performing this process. This guarantee is under the responsibility of the data controller.

If personal data that should not be deleted is affected by the deletion process and becomes inaccessible and/or unusable, the following methods that the ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. can apply upon the decision of the DPA Working Group, will also be considered as deletion when provided together:

- a) Archiving personal data in a way that cannot be associated with the data subject
- b) Ensuring that personal data is completely inaccessible
- c) Implementing all necessary technical and administrative measures to ensure that personal data is accessed only by authorized personnel when necessary
- d) The specified deletion counting methods are subject to the Regulation and are the responsibility of the Data Controller to be updated in relevant cases.

7.2. DESTRUCTION OF PERSONAL DATA

The destruction process will be carried out when ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. processes data in physical record environments, and ÇAKIR İNŞAAT İTH. İHR.

PERSONAL DATA STORAGE, DESTRUCTION, AND ANONYMIZATION POLICY

SAN. VE TİC. LTD. ŞTİ. is obligated to render this data irretrievable. During these procedures, employees and relevant departments of ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. are required to report the relevant data to the Personal Data Protection Authority (KVKK) Working Group. Subsequently, ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. will take all necessary technical and administrative measures.

7.3. ANONYMIZATION OF PERSONAL DATA

The process of anonymization involves rendering personal data processed by ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. unidentifiable and unassociated with any identified or identifiable individual, even if matched with other data.

The anonymization of personal data is the responsibility of the data controller department within ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. The data controller department may seek assistance from different departments within ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ., as long as the supervision for data destruction is carried out by the data controller department itself.

During the anonymization of data, ÇAKIR İNŞAAT İTH.İHR.SAN.VE TİC.LTD.ŞTİ. may use methods such as one-way functions and encryption. In cases where the accuracy of the applied method cannot be ensured, consultation with the KVKK Working Group is necessary.

8. METHODS AND PROCESS OF PERSONAL DATA DESTRUCTION

The methods that can be used during the destruction of personal data are defined in this Policy by ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. The data owner department is responsible for determining and applying the appropriate method according to the situation defined in this Policy.

During the destruction of personal data, employees of ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. choose the appropriate method from the following options to perform the destruction:

1. Overwriting:

Overwriting is the process of writing random data consisting of 0s and 1s at least 8 times on magnetic media and rewritable optical media to render the old data unreadable.

2. Magnetization:

Magnetization is the process of subjecting magnetic media to a high-value magnetic field to physically alter the data on it, making it unreadable.

3. Physical Destruction:

Physical destruction involves melting, pulverizing, grinding, or similar processes to physically destroy optical or magnetic media. It is applied when methods like magnetization or overwriting fail.

PERSONAL DATA STORAGE, DESTRUCTION, AND ANONYMIZATION POLICY

4. Cloud Destruction:

Cloud destruction involves notifying the contracted service provider of the destruction of personal data stored on cloud systems, followed by the destruction of all copies of encryption keys related to the personal data.

5. Destruction of Personal Data in Environmental Systems:

Destruction of personal data residing in systems such as printers, fingerprint units, door entry turnstiles, etc., involves overwriting, magnetization, or physical destruction applied to internal units if present, or to the entire device if not. These destruction processes must be carried out before devices undergo backup, maintenance, or similar procedures.

9. RETENTION AND DESTRUCTION PERIODS

1. Periodic Destruction and Legal Retention Periods

Physical and digital data that have reached the legal retention and destruction periods are periodically destroyed. ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. deletes, destroys, or anonymizes personal data in the first periodic destruction process following the emergence of the obligation to delete, destroy, or anonymize personal data. Periodic destruction is carried out every 6 months for all personal data. The processes related to the deleted, destroyed, and anonymized data are kept for a minimum of 3 years free from other legal obligations.

2. Deletion and Destruction Process Upon Data Subject's Request

When data subjects request the deletion or destruction of their personal data by contacting our company, we assess the current processing conditions of the personal data and take the necessary actions accordingly. If all the processing conditions of the personal data have ceased to exist, we delete, destroy, or anonymize the personal data in question as per the request. Our company processes the request within thirty days at the latest and informs the data subject.

If all the processing conditions of the personal data have ceased to exist and the relevant personal data has been transferred to third parties, the data controller informs this situation to the third party; ensures that the necessary procedures are carried out under the Regulation.

If all the processing conditions of the personal data have not ceased to exist, our company may reject the request by explaining the reasons, and communicates the rejection response to the data subject in writing or electronically within thirty days.

10. CHANGES TO THE POLICY

1. Following any official changes in the relevant legislation, ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. reserves the right to make amendments to this Policy to ensure compliance with these changes.

2. ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. will share the updated Policy with its employees via email in a format that allows review, and will make it accessible to employees through the corporate intranet.

PERSONAL DATA STORAGE, DESTRUCTION, AND ANONYMIZATION POLICY

11. EFFECTIVE DATE

The policy prepared by ÇAKIR İNŞAAT İTH. İHR. SAN. VE TİC. LTD. ŞTİ. has come into effect on 14.08.2022.