

TURKEY

ANNEX TO THE GLOBAL PRIVACY STATEMENT

Last updated on: 1st June 2026

WHAT IS THIS ANNEX ABOUT AND WHEN IT IS RELEVANT TO YOU

This annex to the CNH Global Privacy Statement contains additional information and details which are specific to Turkey.

This annex is relevant to you if:

- your Personal Data is processed by an CNH entity established in Turkey;
- you are in Turkey and your Personal Data is processed by a CNH entity outside Turkey that offers goods or services to individuals in Turkey.

APPLICABLE DATA PROTECTION LAW

The applicable data protection law in Turkey is the Law on Protection of Personal Data No. 6698, which came into effect on April 7th, 2018 (KVKK).

Other than the KVKK, there are other central legislative measures that constitute the framework of the protection of Personal Data in Turkey.

LEGAL JUSTIFICATION FOR THE PROCESSING OF PERSONAL DATA UNDER THE KVKK

The KVKK provides specific legal justifications for the processing of Personal Data. Under the KVKK, at least one of these must apply for the processing of Personal Data to be lawful.

You can find an explanation of the legal justifications for the processing of your Personal Data in Section 3 of the Privacy Statement.

SPECIAL CATEGORIES OF PERSONAL DATA UNDER THE KVKK

Certain types of Personal Data are subject to additional protection under the KVKK. Under the KVKK, special categories of personal data may include, among others, health information, data relating to clothing and appearance, trade union membership and other categories listed in Article 6 of the KVKK, to the extent such data are processed by CNH. This categories of data may be processed, as applicable:

- when necessary for the fulfillment of obligations relating to employment, health and safety, social security, or social assistance, or
- based on the explicit consent of the data subject

INTERNATIONAL DATA TRANSFERS

Cross-border data transfers can be carried out if the criteria set forth in Articles 5 and 6 of the DP Law are fulfilled and one of the following conditions is met.

- **Adequacy decision:** The destination country is covered by an adequacy decision issued by the KVKK.
- **Appropriate safeguards:** in the absence of an adequacy decision, except for cross-border transfers that are irregular, cross-border data transfer can be conducted if there is one of the following safeguards in place:
 - Binding Corporate Rules (BCRs) for intra-group transfers, approved by the KVKK.
 - Standard contractual clause (SCCs) is signed and submitted to the KVKK.
 - A commitment letter is signed and approved by the KVKK.

YOUR PRIVACY RIGHTS

If you wish to exercise one or more rights you are granted by applicable data privacy law, you can submit a request to us at any time by:

- completing the online [Privacy Request Form](#)
- sending an email to: Privacy-EMEA@cnhind.com