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## 1 Introduction

Within the scope of the "Personal Data Protection Law" numbered 6698, which entered into force on March 24, 2016; In the processing of personal data, protecting the fundamental rights and freedoms of individuals, especially the privacy of private life, and the obligations of natural and legal persons who process personal data and the procedures and principles to be followed are regulated. In this context, in terms of following up and providing the work and transactions that should be carried out as the DATA CONTROLLER regarding the storage, processing and disposal of the information that our business has obtained and which is accepted as personal data within the scope of the law; A POLICY ON THE PROTECTION, PROCESSING AND DISPOSAL OF PERSONAL DATA IS IMPLEMENTED. In this context, in the capacity of Data Controller determined by the Law on the Protection of Personal Data; Within the scope of the care and responsibility we show for the security of the personal data of employee candidates, employees, visitors, employees of the institutions we cooperate with and other real persons, for the purposes stated below, "personal data of all real persons associated with the Company; Processing, recording, storing in accordance with the rules of law and transferring/disclosure to third parties limited to the purpose for which they are processed within the limits allowed by the legislation, adhering to the scope of the Personal Data Protection Law and other legal regulations, but not limited to the rules of society and honesty principles also taking into account; It is issued for the purpose of storing and disposing for the period required for the purpose for which it is processed, within the scope of the business requirements, in a limited and extent, within the framework of lawful purposes and for the period required by the legal legislation and / or for the purpose for which they are processed.

## 2 Purpose

The main purpose of this Policy is to ensure that the basic principles of the company practices determined for the processing and protection of personal data of employee candidates, employees, visitors, employees of the institution we cooperate with and other natural persons and these are learned by the relevant persons.

## 3 Scope

This Policy; relates to all personal data of employee candidates, employees, visitors, employees of the institution we cooperate with, and other real persons, which are processed automatically or by non-automatic means provided that they are part of a data recording system.

## 4 Processing of personal data obtained / to be obtained within the scope of employee candidates, employees and commercial activities (Manufacturer - Supplier - Subcontractor - Customer)

### 4.1 Documents to be Requested from Employee and Candidate Employee;

#### • Identity Data

Your name, surname, TR Identity Number, date of birth, country of birth, city of birth, gender, marital status, nationality

#### • Contact Data

Your phone number, full address information, e-mail address

#### • Sensitive Personal Data

Your disability, blood type, reason for exemption from military service, criminal record, health status, fingerprint and retina scan, face scan and other

#### • Education Data

Your education status, education information (school name, semester information, graduation average), foreign language information, education and skills, seminars and courses you have attended, certificate information, computer knowledge

#### • Visual and Audio Data

Your total experience, employment status and title, work experiences (company names, periods of employment, job description) Driver's license data, competencies, hobby, salary expectation, military status, reference information

### 4.2 Purpose of Processing Personal Data of Candidate Employees

Employee candidate personal data is processed for the following purposes, as it is necessary for the evaluation of the job application and the establishment of the employment contract, within the framework of the employee candidate-employer relationship within the framework of the job application he/she has made to our company:

- Recruitment of new staff, examining the candidates and determining the new candidate to be employed,
- Sharing the notes taken on your resume with the manager so that the manager can better understand and get to know the candidate,
- Confirming the data with the reference people you include in your resume,
- To verify how well you fit with the position and to record your resume information for future confirmation,
- Recording the CV we shared with you via e-mail in case we need it in the short or long term,

### 4.3 Sensitive Personal Data of Employee and Candidate Employees;

Within the scope of the Personal Data Protection Law; Data on race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, clothing, membership in associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, if any, and biometric and genetic data are of sensitive personal data.

### 4.4 Places to Transfer Candidate Employee Personal Data;

In order to confirm your personal data with the people you refer to, it can be shared with the people in question and the human resource unit that follows the recruitment process.

### 4.5 Purpose of Processing Personal Data of Employees

Your personal data, which we have mentioned above, is processed for the following purposes within the framework of the employee-employer relationship within the framework of your current work in our company:

- Planning and fulfillment of Human Resources processes,
- Creation of personnel files, payroll,
- Personnel employment contract process management,
- Providing the health services of the personnel,
- Allocating telephone, line and vehicle to the personnel within the scope of the employment contract,

- Execution of the processes of preparing power of attorney and list of authorized signatures,
- Making emergency preparations and conducting operations,
- Execution of occupational health and safety processes,
- Accident and legislation management within the scope of occupational health and safety,
- Designing the processes of service procurement contracts,
- Planning, auditing and enforcement of information security processes
- Opening and authorizing e-mail accounts for employees,
- Keeping internet log records,
- Planning and executing corporate communication activities,
- Planning personnel travels and conducting advance processes,
- Making card and service records for personnel entries,
- Continuity of budgeting processes,
- Giving and managing personnel training,
- Planning and execution of in-house training and orientation programs,
- Management of board decisions,
- General assembly meeting plan and management,
- Follow-up of litigation and legal affairs,

#### 4.6 Places to Transfer Employee Personal Data

Personal data processed within the scope of the above-mentioned purposes; In accordance with the basic principles stipulated in the PPD Law and within the framework of the personal data processing conditions and purposes specified in the 8th and 9th articles of the PPD Law; business partners, shareholders, provided that it is relevant; Some of your data (professional qualification certificate) to Public Institutions and Organizations (SSI, İşkur and other legally authorized public institutions and organizations), banks, independent audit companies in order to carry out our activities, within the framework of legal obligations and legal restrictions, and companies with which we have commercial relations , occupational safety training forms, SSI. records and other) and other institutions and organizations that will be allowed within the legal framework.

#### 4.7 Purpose of Processing Customer, Supplier and Visitor Personal Data,

- Product Sale
- Performance of after-sales services,
- Wholesale of spare parts and accessories,
- Fulfilling the requirements of licensing and dealership agreements,
- Carrying out collection transactions, including mail order and transfer orders,
- Providing various advantages to customers through product-service promotion, information, personalized advertisements, campaigns and other benefits, sending commercial electronic messages within the framework of loyalty programs, surveys and tele-sales applications, statistical analysis,
- To carry out studies to improve service quality and to provide better service,
- To issue invoices for our services,
- To outsource services,
- To receive services and technology services on subjects that are not in their field of expertise,
- To confirm identity,
- To answer questions and complaints,
- To take necessary technical and administrative measures within the scope of data security,
- Financial agreement on the products and services offered with the relevant business partners and other third parties,
- Provision of necessary information in accordance with the demands and audits of regulatory and supervisory agencies and official authorities,
- To preserve information on data that should be kept in accordance with the relevant legislation,
- To ensure the control of the consistency of the information,
- To measure customer satisfaction,
- To use the data obtained through the website or social media channels for marketing purposes through third party agencies,
- To fulfill legal obligations,
- Execution/follow-up of financial reporting and risk management processes,
- Execution/follow-up of legal affairs,
- To create and monitor visitor records.

#### 4.8 Customer, Supplier and Visitor Sensitive Personal Data

Within the scope of the Personal Data Protection Law; Data on race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, clothing, membership in associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, if any, and biometric and genetic data are of sensitive personal data.

#### 4.9 Places to Transfer Customer, Supplier and Visitor Personal Data

Our company can transfer the personal data and personal data of the personal data owner to third parties by taking the necessary security precautions in line with the personal data processing purposes that are in accordance with the law. Although the records of our company are not shared with foreign countries in general, personal data can be transferred to

foreign countries that are declared to have adequate protection and determined under the Personal Data Protection Law and related regulations Personal Data Protection, Processing and Disposal Policy 4/6. The transfer reasons are explained below:

- If there is a clear regulation about transfer of personal data by law,
- If it is necessary to transfer personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract,
- If personal data transfer is mandatory for our Company to fulfill its legal obligation,
- If personal data transfer is mandatory for the establishment, exercise or protection of any right,
- If it is mandatory for the legitimate interests of our Company, provided that the transfer shall not violate the fundamental rights and freedoms of the data subject.

#### 4.10 Processing of Personal Data Regarding Internet Use

Our company maintains log records of internet access in order to monitor and control existing computer and network systems within the company, to prevent industrial espionage, to prevent all kinds of company materials from being taken out or to be shared with others, and to deal with other works outside of their office during working hours which are kept within the framework of the Law on Combating Crimes Committed through Publications and other legislation. These records can be processed when requested by authorized public institutions and organizations or to fulfill legal obligations within the scope of internal audits of our company.

#### 4.11 Processing of Personal Data regarding Security Camera, Retina Scan and Fingerprint Application

In order to ensure and protect workplace safety, some personal data and sensitive personal data can be processed by our company. In our company, the security camera monitoring activities and some key systems such as fingerprint and retinal scanning are used to monitor and record the guests and employees in the company. These transactions, carried out by our company, are carried out within the scope of ensuring the safety of the workplace and the employees and guests in the workplace, and within the scope of informing all employees and incoming visitors.

### 5 Storage and disposal periods of personal data

#### 5.1 Recording Media of Personal Data

Personal data processed by our Company for creating personnel files, keeping visitor records, evaluating job applications, customer and supplier records, and for other reasons; are securely stored in non-electronic media such as paper, forms, written and printed documents, cards and color charts, and in electronic media through servers, all kinds of software programs, workplace personal computers, mobile devices, optical discs, memories.

#### 5.2 Storage Periods of Personal Data

Personal and/or sensitive personal data belonging to our company's employee candidates, employees, customers, suppliers, visitors and employees of third parties, in accordance with the storage conditions determined within the scope of the Personal Data Protection Law, for the storage of personal data, for the periods stipulated in other laws. are stored as limited as a minimum, and in the absence of a period stipulated in the legal legislation, stored for the period required to be kept in accordance with our company's practices and current practices in the sector, taking into account the requirements of the situation.

Within this scope;

- Law on Protection of Personal Data No. 6698
- Turkish Code of Obligations No 6098
- Social Security and General Health Insurance Law no. 5510
- Labor Law No. 4857
- Law No. 5651 on the Regulation of Publications Made on the Internet and Fight Against Crimes Committed Through These Publications
- Occupational Health and Safety Law No 6331
- Tax Procedure Law No. 213
- Turkish Civil Code No. 4721
- Turkish Commercial Code No. 6102
- Execution and Bankruptcy Law No. 2004

and the retention periods stipulated within the framework of all other legal regulations that contain the regulation regarding the retention periods of personal data, although not listed here.

## 5.3 Disposal of Personal Data (Deletion, Disposal and Anonymization)

Personal Data processed by our company, within the scope of the Regulation on the Deletion, Disposal or Anonymization of Personal Data;

- Elimination of all conditions for the processing of personal data,
- In case the person concerned withdraws their explicit consent,
- Upon the request for the deletion, disposal and anonymization of the personal data of the data subject,
- With the decision of the Personal Data Protection Authority,
- It is carried out within the scope of the necessity of deletion, disposal or anonymization of personal data by the data controller ex officio or upon the request of the data subject, in the event that the periods specified in the legal legislation expire.

## 6 Security and Precautions of Personal Data

### 6.1 Technical and Administrative Measures for the Processing

Protection and Storage of Personal Data Within the scope of the Law on the Protection of Personal Data and the Regulation on Personal Data, Deletion, Disposal or Anonymization of Personal Data; It includes the arrangements made and/or to be made for the formation of the policy for the necessary technical and administrative measures by our company for the following; Storing personal data and sensitive personal data in a secure environment, Blocking the access of third parties and Ensuring the prevention of processing other than the purposes stipulated by the law, and Disposal if the storage purpose ceases to exist.

#### • Technical measures to be implemented

Preventing external interventions by means of virus programs related to computer systems of our company, user authorization regarding access to information systems, access authorizations are limited, and access to former employees is blocked.

In order to audit the security vulnerabilities of information systems, they are subjected to external impact tests and new measures are taken according to the results,

Taking necessary measures to prevent unauthorized access to the Server Room, Taking access records to personal data,

Taking a separate system and protection measures for sensitive personal data

Ensuring the security of computer passwords and renewing passwords regularly,

Technical personnel are employed,

Keeping printed (documentary) materials in a closed and locked environment where authorized personnel can access them,

#### • Administrative measures to be implemented

Providing relevant training to the personnel,

Internal auditing,

Creation of inventory,

## 7 Disposal of Personal Data

In the event that the above-mentioned conditions are met, the necessity of destroying personal data occurs; By irreversibly deleting personal data on servers and electronic media, users' access authorization is revoked.

Records kept in the physical environment are destroyed by destroying them with a shredder. Portable memory is destroyed by destroying optical and magnetic cards.

Although the period of periodic destruction is determined as 6 months for our company, in case of detection of personal data whose processing conditions are no longer valid and whose legal storage period has passed, action is taken immediately within the scope of the destruction policy.

### Anonymization of Personal Data

It is the elimination of the reasons requiring the processing of the personal data being processed by our company, or making the personal data incompatible with an identifiable natural person, even if they are matched with other data, upon the request of the data owner.

## 8 Rights of Personal Data Owners

Pursuant to Article 11 of the Personal Data Protection Law, the applicant personally, on the condition of proving his identity, regarding his personal data;

- a) Learn whether or not your personal data have been processed,
- b) Request information concerning the processing if your personal data have been processed,
- c) Learn the purpose for the processing of your personal data and whether your personal data have been used in accordance with the purpose,
- ç) To know the third parties to whom your personal data is transferred at home or abroad,
- d) Requesting the correction of the data in the event they are processed incompletely or inaccurately,
- e) To request his personal data to be deleted or destroyed under the conditions laid down in the Article 7.
- f) To request notification of the operations carried out in compliance with subparagraphs (d) and (e) to third parties to whom his personal data has been transferred,
- g) Object to occurrence of any result deriving from a decision based solely on automated processing and that is to your detriment,
- ğ) To claim compensation in case of suffering loss due to illegal processing of the personal data.

Your requests in your application will be concluded free of charge within thirty days at the latest, depending on the nature of the request. However, if the transaction requires a separate cost, the tariff determined by the Personal Data Protection Board may be charged.

## 9 Enforcement and updateability

This policy for the Processing, Protection, Storage and Disposal of Personal Data created by our workplace may be updated from time to time, taking into account the legal legislation and implementing regulations and company needs. These updates will be shared through appropriate methods and the website, and those concerned can be informed of the changes by following them here.

DATA CONTROLLER:  
CONTACT INFORMATION:  
DATA REPRESENTATIVE:  
CONTACT INFORMATION:

## 10 Definitions

**Personal Data:** Any information related to real person who is identified or identifiable.

**Personal Data Owner:** Real person whose personal data is processed.

**The processing of personal data:** "data processing" refers to all kinds of procedures that can be performed on personal data such as; acquiring, recording, storing, preserving, changing, reorganizing, disclosing, transferring, taking over, making available, classifying or blocking the usage of the personal data through fully or partially automatic means or non-automatic means provided that they are part of any data recording system .

**Sensitive personal data:** Data on race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, clothing, membership in associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, if any, and biometric and genetic data are of sensitive personal data.

**Explicit consent:** a consent about a specific subject based on information and expressed in free will. Anonymization: It is the change of personal data in such a way that it loses its quality as personal data and this situation cannot be undone. (Making personal data cannot be associated with a natural person.)

**Anonymization:** It is the change of personal data in such a way that it loses its quality as personal data and this situation cannot be undone. (Making personal data cannot be associated with a natural person.)

**Employees, Shareholders and Officials of the Institutions We Collaborate with:** Real persons, including the shareholders and officials of the institutions we have business relationships with (such as but not limited to business partners, suppliers, etc.).

**Third Person:** Other natural persons not covered by this Policy and LPPD Policy (For example, guarantor, companion, Employee Candidates).

**Data processing Data controller:** BThe person who determines the purposes and means of processing personal data and manages the place where the data is kept systematically (data recording system).

**Veri sorumlusu:** Kişisel verilerin işleme amaçlarını ve vasıtalarını belirleyen, verilerin sistematik bir şekilde tutulduğu yeri (veri kayıt sistemi) yöneten kişi.

**Visitor:** Real persons who have entered the premises of our company for various purposes or visited our websites.