
POLICY ON PROTECTION OF PERSONAL DATA AND PRIVACY

Version 1.0

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FOREWORD

Protection of Personal Data is of great importance for Trakya Döküm San. ve Tic. A.S. We carefully store the information of everyone who has get into contact with us in any way and who has left his personal data to us. We have taken all necessary measures within the company to ensure the security of this information. You can make operations with TRAKYA DÖKÜM by feeling that your personal data will be safe. We will observe your rights regarding your data, which are guaranteed by both the Turkish Constitution and the Turkish Laws. We are sharing with you our Data Policy below which is in force in our company.

You may be sure that we will show all sensitivity to your suggestions for improvement, to your applications and to your possible complaints. You can contact us for all of your hesitations about your personal data. We will show the same sensitivity and care for the protection of your personal data as we do in all of our services.

Best Regards,

Trakya Döküm San. ve Tic. A.S.

1. Its Purpose

As Trakya Döküm San. ve Tic. A.S. (hereinafter “TRAKYA DÖKÜM”), collected personal data has been kept private until today due to the sensitivity of the works we have been dealing with and it has never been shared with third parties out of its purpose. Protection of personal data is the essential policy of our company. Before any legal regulation, our company attached great importance to the privacy of personal data, and adopted that as a working principle. As TRAKYA DÖKÜM, we undertake to comply with all the liabilities stipulated by the Law on Personal Data Protection.

2. Its Scope and Replacement

This Policy issued by our Company has been prepared in accordance with the Law on the Protection of Personal Data (LPPD), No. 6698. The law has entered into force with all its provisions as of today.

The data obtained from you with your consent or in accordance with other legal compliance conditions listed in the Law, will be used in order to increase the quality of the services we offer and to improve our quality policy. Also, some of the data that we have, are depersonalized and anonymized. These data are the ones that are used for statistical purposes and are not subject to the implementation of the Law and our Policy.

TRAKYA DÖKÜM's Policy on Protection of Personal Data and Privacy aims to protect the data obtained automatically from our customers, prospective customers, employees, and customers and employees of companies working in partnership with us, or other persons, and includes the relevant regulations.

Our company reserves the right to amend our policy and our Regulation / Directive provided that the amendment be in compliance with the Law and for better protection of personal data.

3. Essential Rules for the Processing of Personal Data

- a) **Compliance with the law and honesty rules:** TRAKYA DÖKÜM questions the source of the data that it collects or that comes from other companies and attaches importance to obtaining them in accordance with the law and honesty.
- b) **Being true and up-to-date when necessary:** TRAKYA DÖKÜM attaches importance to the fact that all data within the organization are correct, that they do not contain false information, and finally, in case there is a change in personal data, that it is updated when it is transmitted to itself.
- c) **Processing for specific, clear and legitimate purposes:** TRAKYA DÖKÜM processes data in a limited way only for the purposes which it received approval of individuals and during the service it provides. Other than business purpose, it does not process the data, use, or have it used.
- d) **Being connected to, limited to and in proportion with the purpose of processing:** TRAKYA DÖKÜM uses the data only for the purposes for which it is processed and to the extent required by the service.
- e) **Being stored for the period stipulated in the relevant legislation or required for the purpose for which it is processed:** TRAKYA DÖKÜM stores the data arising from the contracts within itself as much as the durations stipulated in the Law for conflicts, the requirements of the commercial and tax law. However, when these purposes are disappeared, it erases or anonymizes the data. It deletes or destroys them according to the Personal Data Deletion Directive.

It is crucial to state that whether TRAKYA DÖKÜM collects or process the data either based on consent or in accordance with the law, these principles that we have listed above, are still in force.

According to article 11 of LPPD, you have the following rights. In order to facilitate these rights, a separate application form has also been prepared by TRAKYA DÖKÜM and presented to you on our website.

The persons whose personal data are processed by TRAKYA DÖKÜM, have following rights by contacting the relevant person of our company who is announced at our web page;

- a) To learn whether your personal data is processed or not,
- b) To request the relevant information if his personal data has been processed;
- c) To learn the purpose of the data processing and whether it is used for intended purposes or not,
- d) To know the third parties within the country or abroad to whom personal data has been transferred,
- e) To request correction of personal data in case that it is processed incomplete or incorrect,
- f) To request the deletion or destruction of personal data within the framework of the conditions stipulated in the law,
- g) To request notification of the operations carried out in compliance with subparagraphs (e) and (f), to third parties to whom his personal data has been transferred,
- h) To object to the occurrence of a result against the person himself by analyzing the processed data exclusively through automated systems,
- i) To request the compensation of the damage in case of being exposed to damage due to unlawful processing of personal data.

As TRAKYA DÖKÜM, we respect these rights.

4. Principle of Maximum Saving / Maximum Parsimony

According to our principle named as the principle of maximum saving or parsimony, the data received by TRAKYA DÖKÜM is processed into the system only up to the required extent. Therefore, the issue that which data we will collect, is determined according to the purpose. Non-required data is not collected. Other data transferred to our company are transmitted to company's information systems likewise. Redundant information is not stored at the system but it is either erased or anonymized. These data may be used for statistical purposes.

5. Deletion of Personal Data

In case of expiration of the legally required periods, completion of judicial processes or when other requirements are eliminated, these data are deleted, destroyed or anonymized by our company automatically or upon the request of the relevant person.

6. Accuracy and Data Up-to-datedness

In principle, the data within TRAKYA DÖKÜM is processed upon the declaration of the relevant persons and compliant with the way they declared. Neither TRAKYA DÖKÜM is liable to investigate the accuracy of the data declared by customers or by persons getting in contact with TRAKYA DÖKÜM, nor is it done due to the law and our working principles. The declared data is considered as accurate. The principle of accuracy and up-to-datedness of personal data has been adopted also by TRAKYA DÖKÜM. Our company updates the personal data that it process, upon the official documents it receives or upon the request of the relevant person. It takes necessary measures for that.

7. Privacy And Data Security

Personal data are private and TRAKYA DÖKÜM abides by this privacy. Personal data can only be accessed by authorized persons within the company. All necessary technical and administrative measures are taken by TRAKYA DÖKÜM in order to protect the personal data collected, to prevent unauthorized persons from obtaining them, and to prevent customers from being victimized. Within this framework, it is ensured that the software complies with the standards, and the third parties are selected carefully, and the data protection policy within the company is being obeyed within the

company. Data protection is also requested from companies with whom we share personal data in accordance with the law.

8. Purposes of Data Processing

The collection and processing of personal data of TRAKYA DÖKÜM will be carried out for the purposes specified in the clarification text.

9. Data Of Customer, Prospective Customer And Business And Solution Partners

a. Collection And Processing Of Data For Contractual Relationship

If a contractual relationship is established with our customers and prospective customers, collected personal data may be used without obtaining the customer's consent. However, this utilization realizes in line with the purpose of the contract. The data is used for better performance of the contract and to the extent of the service requirements, and it is updated by contacting customers when necessary.

b. Data of Business and Solution Partners

TRAKYA DÖKÜM adopts the principle of acting in accordance with the law while sharing data both with its business partners and its solution partners. Data is shared with business and solution partners only receiving a commitment to data privacy and only as much as the service requires, and these parties are requested to take precautions to ensure data security.

10. Data Processing For Advertising Purposes

In accordance with the Law on the Regulation of E-Commerce and the Regulation on Commercial Communication and Commercial Electronic Messages, electronic messages for advertising purposes can only be sent to those who gave approval beforehand. Explicit existence of the consent of the person to whom the advertisement will be sent is necessary.

TRAKYA DÖKÜM also abides by the details of the "approval" determined in accordance with the same legislation. The approval to be obtained should cover all commercial electronic messages sent to the electronic contact addresses of the buyers in order to promote and market our company's goods and services, to promote its enterprise or to increase its recognition or with contents such as celebrations and wishes. This approval can be obtained in writing in a physical form or through any means of electronic communication. The important thing is the existence of positive declaration of will about that the buyer agrees to accept the receipt of commercial electronic messages and his name, surname and electronic contact address.

11. Data Operations Carried Out Due To The Legal Obligation Of The Company Or Due To Being Explicitly Stipulated In The Law

Personal data may be processed without further consent due to the processing is stipulated clearly in the relevant legislation or in order to fulfill a legal obligation determined by the legislation. The type and scope of data processing must be required for legally permitted data processing activity and it must comply with the relevant legal provisions.

12. Data Processing of the Company

Personal data can be processed in accordance with the service that the company offers, and in line with legitimate purposes of the company. However, the data cannot be used for illegal services in any way.

13. Processing of Sensitive Personal Data

According to the Law, Individuals data related to their race, ethnic origin, political thought, philosophical belief, religious, sect or other beliefs, costume and attire, association, foundation or

union membership, health, sexual life, criminal conviction and safety measures and biometric and genetic data are sensitive personal data.

TRAKYA DÖKÜM takes all adequate measures separately determined by the Board in the processing of sensitive personal data.

TRAKYA DÖKÜM can only process sensitive personal data with the approval of the individuals only for the purpose for which they are collected in order to provide better services.

14. Data Processed by Automated Systems

TRAKYA DÖKÜM acts in accordance with the Law on the data processed through automated systems. Information obtained from these data cannot be used against the person himself without his/her explicit consent. However, TRAKYA DÖKÜM can take decisions about the people whom it will do operation, by using the data in its system.

15. User Information and Internet

In the event that personal data is collected, processed and used in the websites of TRAKYA DÖKÜM and other systems or applications, the relevant persons are informed with a privacy statement and, if necessary, about cookies.

Persons are informed about our applications on web pages. Personal data shall be processed in accordance with the law.

16. Data Belonging to Our Employees

a. Processing Data for Business Relationship

The personal data of our employees can be processed without approval as much as they are necessary for business relations and health insurance. However, TRAKYA DÖKÜM ensures the privacy and protection of data belonging to its employees.

b. Processing Due To Legal Obligations

TRAKYA DÖKÜM can process the personal data of its employees without obtaining a further consent due to the processing is clearly stated in the relevant legislation or in order to fulfill a legal obligation specified in the legislation. This issue is limited to the obligations arising from the law.

c. Processing In Favor Of The Employees

TRAKYA DÖKÜM can process personal data without approval for transactions in the interests of company employees, such as private health insurance. TRAKYA DÖKÜM can also process the data belonging to the employees for disputes arising from business relationships.

d. Processing of Sensitive Personal Data

According to the Law, Individuals data related to their race, ethnic origin, political thought, philosophical belief, religious, sect or other beliefs, costume and attire, association, foundation or union membership, health, sexual life, criminal conviction and safety measures and biometric and genetic data are sensitive personal data.

TRAKYA DÖKÜM takes adequate measures determined by the Board in addition to the approval of the relevant person in the processing of sensitive personal data. Sensitive Personal data can be processed without the consent of the person only in relation to and limited to the cases permitted by the Law.

e. Data Processed by Automated Systems

Employees' data processed in relation to automated systems can be used in intra-unit promotions and performance evaluations. Our employees have the right to object to the result emerging against

them and they carry out this by following the internal procedures. Employees' objections are also evaluated within the company.

f. Telecommunications and Internet

The computer, telephone, e-mail, and other applications which are allocated to employees within the Company have been allocated to the employee only for business purposes. Employee cannot use any of these means allocated by the company for his/her specific purposes and communication. The company can check and audit all data on these means. The employee undertakes not to keep any data or information other than the business on the computer, the phones or other means allocated to him/her from the moment he/she starts the job.

17. Transfer of personal data both within the country and abroad

Personal data can be shared with the controlling shareholder, as well as business and solution partners, in order to provide the service by TRAKYA DÖKÜM.

TRAKYA DÖKÜM will be able to transfer personal data to suppliers of TRAKYA DÖKÜM to a limited extent in order to provide the services which are required by our company to fulfill the commercial activities of our company and which are outsourced from the supplier.

TRAKYA DÖKÜM is entitled to transfer personal data in accordance with the other conditions in the Law and in accordance with the approval of the person within the country and abroad within the conditions determined by the Board.

18. Rights of the Relevant Person

TRAKYA DÖKÜM recognizes that within the scope of the Law, the relevant person has the right that his/her consent be obtained before the data is processed, and that he/she has the right to determine the fate of the data after the data is processed.

By applying to our contact personal announced by TRAKYA DÖKÜM on our website, the relevant person has right;

- a) To learn whether your personal data is processed or not,
- b) To request the relevant information if his personal data has been processed;
- c) To learn the purpose of the data processing and whether this data is used for intended purposes or not,
- d) To know the third parties within the country or abroad to whom personal data has been transferred,
- e) To request correction of personal data in case that it is processed incomplete or incorrect,
- f) To request his personal data be erased or destroyed under the conditions stipulated in article 7 of the Law,
- g) To request notification of the operations carried out in compliance with subparagraphs (e) and (f), to third parties to whom his personal data has been transferred,
- h) To object to the occurrence of a result against the person himself by analyzing the processed data exclusively through automated systems,
- i) To request the compensation of the damage in case of being exposed to damage due to unlawful processing of personal data.

Nonetheless,

Individuals do not have a right regarding anonymized data within the company. TRAKYA DÖKÜM can share personal data with the relevant institutions and organizations for the purpose of related with exercising a judicial duty or the statutory powers of the state authority, in accordance with the business and contractual relationship.

Personal data owners will be able to send their requests regarding the above-mentioned rights to the company address by fully filling out the application form, which you can obtain from the official website of the Company and by signing with a wet signature, through a registered letter with return receipt and copies of their identity cards (only the front page for the identity card). Your applications shall be concluded as soon as possible according to the nature of your application, or within 30 days at the latest after it reaches our company. You must submit your applications by registered letter with return receipt. In addition, the part of your application only related with yourself will be answered, and an application made about your spouse, relative or friend will not be accepted.

TRAKYA DÖKÜM can request other relevant information and documents from the applicants.

19. Privacy Policy

Either employees or other persons, their data at TRAKYA DÖKÜM is private. No one can use these data, or copy, reproduce, transfer to others, or use for any purposes other than business purposes, without the contract or compliance with laws.

20. Operation Security

All necessary technical and administrative measures are taken in order to protect the personal data collected by TRAKYA DÖKÜM, and to prevent unauthorized persons from obtaining them, and to prevent our customers and prospects from suffering. In this context, it is ensured that the software complies with the standards, and the third parties are selected carefully, and the data protection policy within the company is being observed within the company. Safety measures are constantly being renewed and improved.

21. Audit

TRAKYA DÖKÜM has the necessary internal and external inspections done for the protection of personal data.

22. Notification of Violations

When TRAKYA DÖKÜM is notified of any breach of personal data, it takes immediate action to remedy the aforesaid violation. It minimizes the damage of the relevant person and compensates the damage. When personal data is accessed from outside by unauthorized persons, it immediately notifies the Personal Data Protection Board.

You can apply related with the notification of violations at the address <http://www.trakyadokum.com.tr/> in line with the stated methods. For LPPD Application and Information Request Form