

	KVKK Notice On The Protection and Processing of Personal Data / KVKK Aydınlatma Metni	Doküman No	FRM.BGYS.044
		İlk Yayın Tarihi	24.10.2022
		Revizyon Tarihi	24.10.2022
		Revizyon No	0
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1. Data Controller and Representative

In accordance with the Law No. 6698 on the Protection of Personal Data Law ("KVKK"), as ÇELİKEL ALUMINYUM DÖKÜM İMALAT SANAYİ VE TİCARET ANONİM ŞİRKETİ, As the data controller, your personal data may vary depending on the service provided by our Company and the commercial activities of our Company; automatically or non-automatically, through our Company's units and offices, Group Companies, website, social media channels and similar means, verbally, in writing or electronically, within the scope of the purposes described below; we will be able to process, save, store, classify, update and disclose/transfer to third parties in cases permitted by the legislation and/or limited to the purpose for which they are processed, in accordance with the law and honesty rules.

As long as you benefit from the products and services offered by our company, your personal data can be processed by creating and updating.

For this reason, as ÇELİKEL ALUMINYUM DOKUM İMALAT SANAYİ VE TİCARET ANONİM ŞİRKETİ ("ÇELİKEL" or "Company"), we are responsible for the processing, storing and transfer of your personal data within the framework of our commercial activities, within the scope of the Personal Data Protection Law No. 6698. We have prepared this cautionary text in order to enlighten our visitors, customers, employees, employee candidates, business contacts and platform users (website, mobile application users).


2. Purposes of Personal Data Processing

Your personal data or personal data of special nature are processed for the following purposes, in accordance with the basic principles stipulated in the the Protection of Personal Data Law ("KVKK"), and especially under the KVKK legislation and within the scope of the relevant legislation;

ÇELİKEL, Identity information such as name, surname, TR identity number, copy of identity card, driver's license, contact information, professional and commercial information, business and transactions carried out in a business relationship, tax office, tax identification number, invoice information, payment, debt and personal data such as financial information such as collection information, security camera footage of the visit; While carrying out its activities, it may store, display, analyze and use it to the extent necessary for legitimate commercial and business purposes and in other cases permitted by the relevant legislation in the data recording systems under its control.

Processing personal data in this way and within the framework of the above-mentioned legal reasons; monitoring and management of marketing and sales processes, meeting service requests, satisfaction and complaint management, purchasing products and services needed by ÇELİKEL, ensuring physical, technical, financial and commercial security, making payments, tracking collections, budget and financial planning, accounting, auditing, reporting, resource management, planning, statistics and analysis studies, conducting internal administrative operations, ensuring the general and commercial security of our business, conducting recruitment processes, conducting human resources processes, providing security processes, video recording processes for security purposes, identity and permit processes at the entrances to the facility, implementing OHS activities, coordination of trainings and keeping work accident records, occupational health and environmental visitor procedure and coordination of emergency operations, health processes, guest internet usage records, and obtaining the communication form and providing contact during the business relationship.

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Within the scope of these activities, ÇELİKEL acts in accordance with the obligations stipulated in all relevant legislation, especially the the Protection of Personal Data Law (“KVKK”), regarding the protection of personal data.

3. Methods of Personal Data Collection and Legal Reason Behind

Your personal data is collected in all kinds of verbal, written or electronic media in order to provide the Company services within the legal framework determined in line with the above-mentioned purposes, and in this context, to completely and accurately fulfill the contractual and legal responsibilities of our Company. Your personal data collected for this legal reason can also be processed and transferred for the purposes specified in this text within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the Protection of Personal Data Law (“KVKK”).

Your personal data will be stored and saved, in order to; carry out our activities, ensure the general and commercial security of our facilities and businesses through the camera recording system, visitor statements, training attendance records, forms, eyewitnesses, unit supervisors, petitions, crime scene information, authorized institutions, visitor internet access and registration system. It is collected through different channels such as security cameras, website, e-mail, personal applications, hand-delivery, forms, employee candidates' statements and based on the above-mentioned legal reasons, in order to improve the services we provide and to carry out our commercial activities.

Similarly, personal data belonging to other relevant persons can be obtained directly from the relevant persons or external sources such as the registry gazette, registration information, credit intelligence agencies, etc. By non-automatic means such as printed documents such as tax registries, circular of signature, identity card copy, or fully or partially automatic means such as e-mail, web-based portals used by ÇELİKEL, completely in line with the law, with clear, specific and legitimate purposes, in accordance with the permission of the relevant legislation, to a given extent.

If the personal data of all the above-mentioned groups are directly required for the establishment or performance of a contract, as it is expressly stipulated in the laws, ÇELİKEL's ability to fulfill its legal obligations such as notification, disclosure and announcement, record keeping and storage or the establishment of a right can be obtained for its use or preservation, if it is necessarily needed.

ÇELİKEL may also obtain personal data to the extent necessary for its legitimate interests in line with the purposes explained in detail below, and in such cases it pays attention not to harm fundamental rights and freedoms. The personal data made public by the persons concerned may be processed by ÇELİKEL in accordance with the purpose and scope of the disclosure.

Personal data may be obtained and processed to the extent necessary for the protection of life or physical integrity of a person or another person who is unable to express his or her consent due to de-facto impossibility or whose consent is not legally valid.

Apart from these, in order to carry out our administrative activities, we ensure the general and commercial security of our facilities and businesses through camera recording systems, visitor statements, training participation minutes, forms, eyewitnesses, unit supervisors, petitions, crime scene information, authorized institutions, visitor internet access and registration systems. It is

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collected through different channels such as security cameras, website, e-mail, personal applications, hand-delivery, forms, employee candidates' statements and based on the above-mentioned legal reasons, in order to improve the services we provide and to carry out our commercial activities.

In this context, your personal data can be processed and transferred by obtaining explicit consent in the light of the principles stipulated in Article 4(2) of the Personal Data Protection Law (KVKK) or without obtaining explicit consent in case of the existence of the situations stipulated in Articles 5 (2) and 6 (3).

4. Transfer of Personal Data

Your personal data processed within the scope of the explained purposes; In accordance with the basic principles stipulated in the Personal Data Protection Law (KVKK) and within the personal data processing conditions and purposes specified in Articles 8 and 9 of the KVKK, ÇELİKEL is limited to the purposes stated above; Consultancy services to Group Companies, our business partners, suppliers, customers, shareholders, authorized public institutions and organizations, private individuals, companies that receive support services in order to carry out our activities, and independent audit companies (including lawyers, tax consultants and auditors) within the framework of legal obligations and legal limitations, may be transferred to third parties.

In addition, Personal data will be limited, measured and linked to the above-mentioned legal reasons and purposes, and in any case, to the extent permitted by the relevant legislation; when necessary, it can be shared in strict accordance with the "need-to-know" rule by obtaining explicit consent.

Personal data of the research participants may be shared with the research teams and teams that support ÇELİKEL's authorization for the conduct of the research operation in the field, such as the interviewer, the moderator, the transcription and translation of the interview records, and/or the business partners they work with, within the scope of the above-mentioned legal reasons. The personal data of the research participants are not shared with the organizations conducting the research without their explicit consent.

The personal data of other relevant persons are collected by ÇELİKEL's suppliers, consultants, etc., from which it outsources services within the scope of its commercial activities. It can be shared with ÇELİKEL's subsidiaries and group companies, shareholders or institutions and organizations authorized by law. Within the framework of its activities, the e-mail service provider that ÇELİKEL uses within the scope of its purpose and scope explained in detail in this policy and clarification text, and which is completely dedicated to the realization of internal business and transactions, can operate on servers located abroad.

Due to the legal regulations in our country, we share periodically or upon the request of the authorized authority; identity information, contact information and many other personal data; with the places expressly authorized in the legislation (General Directorate of Security and other law enforcement agencies, Social Security Institution, Tax Offices, Banks, Official institutions and organizations, Regulatory and supervisory institutions).

In addition, upon the request of a court decision and an administrative authority expressly authorized by law, your personal data is shared with the person or institution authorized in the request.

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Apart from this, your personal data is shared with group companies and business connections (contractors, suppliers, external service providers, Insurance Companies, etc.) on a limited basis in order to maintain the activity and increase the service quality.

Without limiting the purposes of sharing your personal data, we ensure the legal and commercial security of ÇELİKEL or its Group Companies and business partners' (Administrative operations for communication carried out by our Company, ensuring the physical security and control of the locations of the Company, business partner/customer/supplier (authorized or employees) evaluation processes, reputation research processes (legal compliance processes, auditing, financial affairs, etc.), maintaining ÇELİKEL's commercial activities, determining and implementing ÇELİKEL's commercial and business strategies, managing and executing ÇELİKEL's human resources processes and employment policies.

Your personal data collected by ÇELİKEL;

- Obtained through explicit consent in the light of the principles stipulated in Article 4 (2) of the KVKK, or
- In case of the existence of the situations stipulated in Articles 5 (2) and 6 (3), after the declaration of foreign countries with sufficient protection to be determined by the Personal Data Protection Board ("Board"), without obtaining explicit consent and in accordance with the rules in Article 9 of the Law, only these can be transferred to persons and organizations residing in countries,
- For countries where it is determined and declared that there is no adequate protection, it can be transferred abroad, provided that the data controllers in Turkey and in the relevant foreign country undertake an adequate protection in writing and the permission of the Board can be obtained in terms of the relevant transfer.

Necessary security measures are taken in case your personal data is shared.

5. The Rights of Data Subjects/Owners Under Article 11 of the Personal Data Protection Law

The rights of the data subject/owners have in accordance with Article 11 of the Personal Data Protection Law (KVKK) are as follows:

- Learning whether data relating to him/her are being processed or not,
- Requesting further information if personal data relating to him have been processed,
- Learning the purpose of the processing of personal data and whether data are being processed in compliance with such purpose or not,
- Learning the third-party recipients to whom the data are disclosed within the country or abroad,
- Requesting rectification of the processed personal data which is incomplete or inaccurate and request such process to be notified to third persons to whom personal data is transferred,
- Requesting deletion or destruction of data in the event that the data is no longer necessary in relation to the purpose for which the personal data was collected, despite being processed in line

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with the PPDA Law and other applicable laws and request such process to be notified to third persons to whom personal data is transferred

- Objecting to negative consequences about him/her that are concluded as a result of analysis of the processed personal data by solely automatic means,
- Demanding compensation for the damages he/she has suffered as a result of an unlawful processing operation.

6. The Use of Personal Data Subject/Owner of His/Her Rights and Responding to Applications

Pursuant to paragraph 1 of Article 13 of the Personal Data Protection Law (KVKK), the data subject can submit his/her request regarding the exercise of his/her above-mentioned rights to our Company in a written form or by other methods determined by the Personal Data Protection Committee. In this context, the channels and procedures through which he/she will submit his/her written application form to our Company within the scope of Article 11 of the Personal Data Protection Law (KVKK) are explained below.

As personal data owners, you can submit your request, which includes the necessary information and documents (copy of identity card, passport, etc.) proving your identity, and your explanations regarding your right that you request to exercise from the rights specified in Article 11 of the the Personal Data Protection Law (KVKK), in the KVKK Application Information and Application Form at www.celikel.com by printing and filling out the form;

(Applicant comes in person and applies with a document proving his/her identity)

- Send a signed copy of the application form to the address "**Samandıra Eyüp Sultan Mahallesi Bayram Sokak No:1 D:6-7 Sancaktepe, İSTANBUL**", in person with the documents identifying your identity, by registered letter with return receipt ("Information Request Pursuant to the Personal Data Protection Law " must be written on the envelope).
- Send notification through a notary to the address "**Samandıra Eyüp Sultan Mahallesi Bayram Sokak No:1 D:6-7 Sancaktepe, İSTANBUL**"("Information Request Pursuant to the Personal Data Protection Law " must be written on the envelope of the notification).
- Send application via Registered Electronic Mail (KEP) address of ÇELİKEL 9678187434985368@hs02.kep.tr, by being signed by the Applicant with the "secure electronic signature" defined in the Electronic Signature Law No. 5070 ("Information Request Pursuant to the Personal Data Protection Law" must be written in the subject line of the e-mail).

We reserve the right to reject your application if the information and documents you have submitted are incorrect or an unauthorized application is made.

Depending on the nature of the request, applications submitted to ÇELİKEL will be answered free of charge within thirty (30) days from the date of receipt of the request by one of the methods described above. However, if the request requires an additional cost, the fee in the tariff determined by the Committee may be charged by ÇELİKEL in accordance with the relevant legislation.

If your application is evaluated negatively, the reasons for rejection will be sent to the address you specified in the application via e-mail or post.

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For information other than Personal Data Protection Law (KVKK) application, you can contact infocelikel@celikel.com via e-mail.

If new application methods are determined by the Personal Data Protection Board, these methods will be announced by ÇELİKEL.

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