

PERSONAL DATA PROTECTION AND PROCESSING INFORMATION NOTICE

Revision Date: December 2019

1. Purpose

Tekyol Plus Yapı Endüstrisi A.Ş. ("TP" or the "Company") aims to process the personal data of data subjects (Annex-1 Personal Data Owners Table) in compliance with Law No. 6698 on the Protection of Personal Data ("KVK Law") and other applicable legislation.

The personal data you provide to our Company and/or obtained by any means by our Company will be processed by our Company as the "Data Controller" in accordance with the following principles:

- Processed in line with the purposes that require their processing and in a limited, relevant, and proportionate manner,
- Ensuring the accuracy and up-to-date status of personal data as provided to or obtained by the Company,
- Recorded, stored, retained, rearranged, shared with institutions authorized to request such personal data by law, transferred to domestic or foreign third parties under the conditions stipulated in the KVK Law, classified, and processed in other ways specified by the KVK Law.

This "Information Notice" is prepared to ensure that the activities carried out by TP comply with the principles set forth in the KVK Law.

2. Conditions for Processing Personal Data

Obtaining the explicit consent of the personal data owner is only one of the legal bases that allow the lawful processing of personal data. If any of the following conditions are

met, personal data may be processed by our Company without the explicit consent of the data owner:

2.1 Processing Is Explicitly Stipulated by Law

If the processing of personal data is explicitly stipulated in the relevant law, our Company may process such data within the legal framework.

2.2 Inability to Obtain the Explicit Consent of the Data Owner Due to Actual Impossibility

If the data owner is unable to give consent due to actual impossibility or if obtaining consent is legally invalid, the personal data may be processed to protect the life or physical integrity of the data owner or another person.

2.3 Processing Is Directly Related to the Establishment or Performance of a Contract

If personal data processing is necessary for the establishment or performance of a contract to which the data owner is a party, this condition is deemed fulfilled.

2.4 Compliance with Legal Obligations of the Company

If the processing of personal data is mandatory for the Company to fulfill its legal obligations, such data may be processed.

2.5 Publicly Disclosed Personal Data

If the personal data owner has made their personal data publicly available, such data may be processed for the purpose of public disclosure.

2.6 Necessity for the Establishment or Protection of a Right

If the processing of personal data is necessary for the establishment, exercise, or protection of a right, such data may be processed.

2.7 Necessity for the Legitimate Interests of the Company

If data processing is necessary for the legitimate interests of the Company, provided that such processing does not harm the fundamental rights and freedoms of the data owner, the personal data may be processed.

3. Collection and Processing of Personal Data of Employees and Employee Candidates

Our Company processes your personal data for the purposes specified in this Information Notice. If the purpose of processing changes, your additional consent will be obtained.

The personal data collected and used by our Company include, but are not limited to, the following:

- Contact Data: Phone number, address, country, email address (including internal and corporate email addresses).
- Identity Data: Name, surname, national ID number, tax ID number, criminal record, residence permit, signature/initials, nationality, parent's names, place and date of birth, gender, driver's license, passport, national ID card, blood type, health report, disability status if applicable, and related documents.
- Employee Candidate Information: Resume, interview notes, and other data of individuals who have applied for a job or internship at the Company.

- Location Data: GPS location and travel data of employees or business associates using company vehicles.
- Salary Data: Payroll information, bank account details for salary payments, and payment receipts.
- Other Data: Photos, diplomas, graduation certificates, certifications, resumes, workplace images and/or audio recordings, references, fingerprint data, and communication records.
- Personnel Processing Data: Passwords, security codes, company email communication records, and logs.
- Financial Data: Tax records, bank account details, credit card numbers, invoice numbers and dates, commercial records, and vendor identification data.
- Customer Transaction Data: Service usage records and transaction details.
- Professional Experience Data: Diploma details and professional certification numbers.
- Request/Complaint Management Information: Data regarding any requests or complaints addressed to the Company.
- Visual and Audio Data: Photos, security camera footage, and audio recordings.
- Physical Security Data: Camera recordings and visitor logs for security purposes.
- Audit and Inspection Data: Data processed during internal or external audits for legal compliance.

Our Company collects personal data through physical and electronic media, cameras placed in Company buildings, and other means necessary to fulfill legal obligations.

4. Transfer of Personal Data to Third Parties

Personal data may be transferred to the Revenue Administration, General Directorate of Security, relevant Company employees, affiliated companies, and related corporate groups for the fulfillment of legal and contractual obligations.

4.1 Transfer of Personal Data to Domestic Third Parties

In accordance with various laws such as the Tax Procedure Law, Labor Law, Social Security Law, Occupational Health and Safety Law, and related regulations, personal data may be transferred for purposes including but not limited to:

- Assessment of employee experience,
- Employee health screenings,
- Monthly social security declarations,
- Payment of salaries and benefits,
- Maintenance of personnel records in compliance with labor laws,
- Notification of tax obligations,
- Reporting of business transactions.

For financial management purposes, personal data may be shared with the Company's affiliated corporate groups.

5. Security and Confidentiality of Personal Data

Our Company implements necessary technical and administrative measures to prevent unauthorized access to personal data, ensure secure data storage, and comply with legal requirements.

6. Deletion, Destruction, and Anonymization of Personal Data

If the reasons for processing personal data cease to exist, the data will be deleted, destroyed, or anonymized either upon request or at the discretion of the Company.

7. Rights of Employees, Employee Candidates, and Third Parties

Under Article 11 of the KVK Law, you may apply to our Company to:

1. Learn whether your personal data is processed,
2. Request information regarding processed data,
3. Learn the purpose of processing and whether it is used accordingly,
4. Learn to whom your data has been transferred,
5. Request correction of inaccurate or incomplete data,
6. Request deletion or anonymization of your data,
7. Object to unfavorable results arising from automated data processing,
8. Request compensation for damages arising from unlawful data processing.

For applications and requests, you may contact us via kvkk@tekyolplus.com.