

****TEKYOL PLUS CONSTRUCTION INDUSTRY INC.
INFORMATION CLARIFICATION TEXT FOR PERSONAL DATA PROTECTION AND PROCESSING
FOR EMPLOYEES AND CANDIDATES****
Revision Date: December 2019

Purpose:

Tekyol Plus Construction Industry Inc. (“TP” or “Company”) aims to process the personal data of real person employees and candidates in accordance with the provisions of the Law on the Protection of Personal Data No. 6698 (“KVK Law”) and other relevant legislation.

As a real/legal person supplier to our Company, the personal data you provide or will provide to us, as well as any personal data obtained by our Company through external means, will be processed by our Company as the “Data Controller” in the following manner:

In a manner related, limited, and proportionate to the purposes that necessitate the processing of your personal data.

Maintaining the accuracy and current status of the personal data you have communicated to us or is reported as per your notice.

Ensuring that the data will be recorded, stored, preserved, restructured, shared with institutions legally authorized to request this personal data, and transmitted domestically or internationally to third parties under the conditions prescribed by the KVK Law, and notifying that the data may be transferred, classified, and processed in other ways listed in the KVK Law.

This “Information Clarification Text” accepts that all activities carried out by TP are conducted in accordance with the principles outlined in the KVK Law.

Collection and Method of Personal Data for Employees/Candidates:

Our Company will process your personal data for the purposes specified in this Information Clarification Text. If there is any change in the purpose of processing your personal data, additional consent will be obtained from you.

The personal data collected and used by our Company, especially belonging to employees/candidates, are as follows:

CONTENT OF PERSONAL DATA:

Contact Data: Phone number, address, country, email address (including internal number and corporate email address).

Identity Data: Name-surname, Turkish ID number, tax identification number, criminal record, residence registration, signature/stamp information, nationality, mother’s name-father’s

name, place of birth, date of birth, gender, and documents like driver's license, passport, national ID, blood type, health report if any, documents regarding disability status, etc.

Salary Data: Salary payment slip according to the employment contract, bank account information for salary payments, data in the receipts related to payments made.

Other Data: Photograph, diploma, graduation certificate, certificates, CV, images and/or audio recordings taken at the workplace, employment references, phone number, email address, fingerprint data, etc.

Personnel Transaction Data: Data necessary and registered within the Company's working system, such as passwords and codes, including correspondence and emails linked to company email accounts assigned to personnel.

Our Company collects the data you provide us, during and after the establishment of the contractual relationship, through every kind of physical or electronic means, including cameras placed in physical or electronic environments, in order to fulfill its legal obligations.

Purposes and Legal Reasons for Processing Personal Data:

Your personal data may be processed by our Company for the purposes specified below, but not limited to:

Ensuring compliance with legal obligations and requirements related to employment, particularly following the Labor Law, Commercial Code, Obligations Law, Occupational Health and Safety Law, Tax Procedure Law, Income Tax Law, Corporate Tax Law, Stamp Tax Law, Value Added Tax Law, and other related legislation:

Submitting SGK (Social Security Institution) declarations,

Making stamp tax declaration notifications of the Employment Contract,

Monitoring the duties and authorities assigned to personnel in the Company,

Ensuring the operation of the Company.

For the establishment and execution of the contract, particularly:

Evaluating personnel CVs and work experiences,

Conducting employee entrance/periodic health examinations,

Submitting monthly SGK declarations,

Making salary payments and any other employment rights,

Keeping personnel files physically and electronically in compliance with the employer's retention and presentation obligations under Occupational Health and Safety, Social Security Law, and Labor Law,

Recording all of the above matters.

For the legitimate interests of the data controller and implementing Company policies, particularly regarding:

Physical Security Data/Camera Records:

Monitoring camera footage within the building and construction site,

Ensuring workplace and construction site security,

Tracking vehicle entries and exits as well as parking usage.

Your personal data will be kept for a reasonable period until the purpose of processing is fulfilled as specified in the relevant legislation and within the legal statute of limitations.

Transfer of Personal Data to Third Parties:

For the purposes of fulfilling legal obligations and requirements of the Labor Law, Social Security Law, Income Tax Law, Corporate Tax Law, and Tax Procedure Law, personal data may be shared with the Revenue Administration, the General Directorate of Security, relevant suppliers of our Company, and group companies.

4.1. Transfer of Personal Data to Third Parties within the Country:

For the fulfillment of legal obligations pursuant to the Income Tax Law, Corporate Tax Law, Tax Procedure Law, Labor Law, Social Security Law, and applicable regulations, laws, directives, and notices, specifically for:

Making stamp tax declaration notifications,

Notifications regarding the purchase and sale of goods and services,

Making notifications for preliminary declarations, VAT declarations, and corporate tax declarations,

Transfer of data to the Social Security Institution and related occupational health and safety experts or legal entities.

For the implementation of Company policies, especially for:

Transferring data to group companies for financial services.

Ensuring the Security and Confidentiality of Personal Data:

Our Company takes necessary technical and administrative measures to ensure an appropriate security level to prevent unlawful processing of personal data and access to personal data in an unlawful manner as per Article 12 of the KVK Law.

5.1. Technical Measures Taken to Ensure Lawful Processing of Personal Data and Prevent Unlawful Access:

Taking technical precautions to the extent that technology allows,

Employing experts in technical matters,

Conducting regular audits on the application of the measures taken,

Establishing the necessary software and infrastructure to ensure security,

Limiting access to personal data processed within the Company,

Using a legally compliant backup program to ensure the secure storage of personal data,

Utilizing software that includes virus protection systems.

TP has taken all kinds of technical and technological security measures to protect your personal data and ensured its protection against potential risks.

5.2. Administrative Measures Taken to Ensure Lawful Processing of Personal Data and Prevent Unlawful Access:

Training and raising awareness of Company employees regarding the KVK Law,

Adding a record to contracts made with individuals to whom personal data is transferred, ensuring that the party receiving the data will fulfill its data security obligations,

Preparing internal policies for the identification of compliance requirements for the KVK Law and the applications to be followed.

5.3. Measures to Be Taken in Case of Unlawful Disclosure of Personal Data:

In case personal data processed is obtained unlawfully by others, our Company will inform the respective data owner and the Board as soon as possible.

Deletion, Destruction, and Anonymization of Personal Data:

According to Article 7 of the KVK Law, even if personal data has been processed in accordance with the relevant legislation, it will be deleted, destroyed, or anonymized by our Company upon the elimination of the reasons necessitating its processing either ex-officio or upon the request of the data owner.

The procedures and principles regarding this will be fulfilled in accordance with the KVK Law and secondary legislation formed based on this Law.

6.1. Techniques for Deletion and Destruction of Personal Data:

Examples include physical destruction, secure deletion from software, secure deletion by an expert, etc.

6.2. Techniques for Anonymization of Personal Data:

Refers to rendering personal data such that it cannot be associated with a specific person even when matched with other data.

Rights of Contractors/Suppliers:

In accordance with Article 11 of the KVK Law, you may apply to our Company and request information about the following matters concerning your personal data:

Learning whether your personal data is processed,

Requesting information regarding your processed personal data,

Learning the purpose of processing personal data and whether it is used in accordance with its purpose,

Learning about the third parties to whom your personal data are transferred,

Requesting correction of your personal data if they are processed incorrectly or incompletely and requesting that the operation performed is notified to third parties to whom the personal data were transferred,

Requesting the deletion, destruction, or anonymization of your personal data when the reasons necessitating the processing of your personal data are eliminated, and requesting

that the operation performed is notified to third parties to whom the personal data were transferred,

Objecting to a result against the data owner, which occurs exclusively due to automated processing of personal data,

Requesting compensation for damages caused by unlawful processing of personal data.

DATA CONTROLLER

We, as Tekyol Plus Construction Industry Inc. (referred to as "TP"), hereby inform you that we process your personal data under the scope of the Law on the Protection of Personal Data No. 6698 (hereinafter referred to as "KVKK") and relevant other legislation as the Data Controller.

DATA CONTROLLER: Tekyol Plus Yapı Endüstrisi A.Ş.

ADDRESS: Ekinciler Caddesi Ertürk Sokak, Onat Plaza No 4 Kat 4 Kavacık Beykoz, 34800

CONTACT: kvkk@tekyolplus.com

Our Company will fulfill your requests arising from the KVK Law via the "Personal Data Owner Application Form." In line with Article 13 of the KVK Law, our Company will respond to your application requests at no cost, depending on the nature of the request, within 30 (thirty) days at the latest. If the request is rejected, the grounds for the rejection will be communicated to you in writing or electronically.

This Information Clarification Text may be revised by our Company when deemed necessary. In such cases, you will be informed accordingly. The most updated version of the Information Clarification Text can be accessed via the link www.tekyolplus.com.