



**MITAS INDUSTRY INC.**

**POLICY OF THE PROTECTION  
AND PROCESSING OF  
PERSONAL DATA AS PER 6698  
NUMBERED LAW ON THE  
PROTECTION OF PERSONAL  
DATA**

V.1.0 – 13.11.2019

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## I. ABOUT THE POLICY

We, as Mitaş Industry Inc. (“Company”), take your personal data's security and our responsibilities towards this issue seriously. For this reason, as per the Law on the Protection of Personal Data (“KVKK”), We give utmost importance to processing and protection of personal data of all real persons with whom we have a relationship.

The purpose of this policy is to explain the rights of real persons as per KVKK and other applicable regulations to protect their privacy of personal life, fundamental rights, and freedoms in terms of processing and sharing their personal data, especially of the real persons with whom our Company have a relationship within its commercial activities.

In addition, this policy, as per 6698 numbered Law on Protection of Personal Data and other related regulations, aims to explain the purpose of processing personal data, legal base, and methods for collecting and sharing personal data.

Our Company reserves the right to change the purpose of processing personal data, its legal base, methods for collecting and sharing data, Policy of Protection and Processing Personal Data.

In order to carry out effectuated legal responsibilities of this Policy, but not limited to these, in event that it is changed the latest version of it will be published on our website.

## II. DEFINITIONS

For the terms and definitions used in this Policy, the meanings defined in 6698 numbered Law on Protection of Personal Data and other relevant regulations shall prevail. In this regard:

- **Explicit Consent:** freely given, specific and informed consent,
- **Data Subject:** the natural person, whose personal data is processed,
- **Personal Data:** all the information relating to an identified or identifiable natural person,
- **Processing of Personal Data:** any operation performed upon personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable, classification or preventing the use thereof, fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means,
- **Board:** the Personal Data Protection Board.
- **Authority:** The Personal Data Protection Authority.
- **KVKK:** 6698 numbered Law on the Protection of Personal Data,
- **Sensitive Personal Data:** The Data relating to persons’ race, ethnicity, political opinion, belief, religion, cult and other beliefs, outfit, union and other membership, health, sexual life, convictions, security data, biometric and genetic data.
- **Policy:** The Policy of our Company on the Protection, Processing, and Demolition of Personal Data.
- **Processor:** the natural or legal person who processes personal data on behalf of the controller upon his authorization,
- **Controller:** the natural or legal person who determines the purpose and means of processing personal data and is responsible for establishing and managing the data registry system.
- **VERBİS:** Controllers Registry Information System.

## III. RELEVANT PERSONS

Our Company may collect and process personal data from the following persons:

- Our customers, shareholders and authorized persons, suppliers, subcontractors, and their workers, business contracts, and potential customers (or real persons related to these), other business partners,

- Real persons (e.g. our customers' employees, customers, suppliers, and contact persons) of whom we collect personal data with regards to the professional services we provide for our customers,
- Our workers and their family members, job applicants and their references,
- Persons who visit our website and follow us on social media.
- Third persons (e.g. distant family members and visiting friends of our workers, ex-employees, etc.)

<b>PERSONAL DATA TYPES</b>	<b>OWNER OF THE DATA</b>
<b>CONTACT DATA</b>	Customers, shareholders, and authorities, suppliers, subcontractors and their workers, business contacts, potential customers (and/or real persons related to these), business partners, workers and authorities of partner institutions, employees, likely employees, third parties.
<b>SENSITIVE PERSONAL DATA</b>	Customers, shareholders and authorities, subcontractors and their workers, employees and employees to-be, workers and authorities of partner institutions.
<b>VISUAL AND AUDITORY DATA</b>	Shareholders and authorities, subcontractors and their workers, potential customers, business partners, workers and authorities of partner institutions, and our employees.
<b>DATA OF VEHICLE</b>	Shareholders and authorities, customers, workers and authorities of partner institutions, employees and employees to-be, visitors, third parties.
<b>DATA OF LOCATION</b>	Authorities, workers, and authorities of partner institutions, employees.
<b>FAMILY MEMBERS</b>	Shareholders and authorities, workers and authorities of partner institutions, employees and employees to-be.
<b>FINANCIAL DATA</b>	Shareholders and authorities, suppliers, subcontractors, and their workers, business contacts, customers and relating real persons, potential customers, business partners, workers and authorities of partner institutions, employees and employees to-be, third parties.
<b>ELECTRONIC DATA</b>	Shareholders and authorities, business partners, workers and authorities of partner institutions, employees and potential employees, visitors, customers, potential customers, third parties (website visitors, persons using the internet access of the Company, etc.)

<b>OCCUPATIONAL AND EDUCATIONAL DATA</b>	Shareholders and authorities, suppliers, business contacts, customers and relating real persons, potential customers, business partners, workers and authorities of partner institutions, employees, and potential employees, third parties.
<b>DATA OF EDUCATION</b>	Shareholders and authorities, business partners, workers and authorities of partner institutions, employees, and potential employees.
<b>TRAVEL DATA</b>	Shareholders and authorities, workers and authorities of partner institutions, employees, and customers.
<b>LEGAL DATA</b>	Shareholders and authorities, suppliers, business contacts, customers and relating real persons, subcontractors and their workers, potential customers, business partners, workers and authorities of partner institutions, employees, potential employees, visitors, and third parties.
<b>DATA OF SECURITY</b>	Shareholders and authorities, suppliers, business contacts, customers and relating real persons, subcontractors and their workers, potential customers, business partners, workers and authorities of partner institutions, employees, potential employees, visitors, and third parties
<b>DATA OF APPLICATION / COMPLAINT MANAGEMENT</b>	Shareholders and authorities, suppliers, business contacts, customers and relating real persons, subcontractors and their workers, potential customers, business partners, workers and authorities of partner institutions, employees, potential employees, visitors, and third parties.

Detailed information about the above table is available in the 8<sup>th</sup> (VIII) section of this Policy.

#### IV. CONTROLLER

Our Company acting as the Controller, within our commercial or business relationships, and to the extent that KVKK permits, in cases where explicit consent is required, by receiving relating persons' explicit consent, can process, record, preserve, reorganize your personal data and transfer it within domestic or abroad.

<b>IDENTITY OF THE CONTROLLER</b>	
<b>COMPANY NAME</b>	Mitaş Endüstri San. Tic. A.Ş.
<b>ADDRESS:</b>	ASO 2 Eskişehir Yolu 42. Km Alcı OSB Mah. 2001 Cad. No:19 Sincan Ankara
<b>CENTRAL REGISTRATION NO</b>	0-6080-4539-0700013
<b>TRADE REGISTRATION NO</b>	176134
<b>OFFICIAL WEB ADDRESS</b>	www.mitasindustry.com
<b>E-MAIL</b>	info@mitasindustry.com

<b>KEP ADDRESS:</b>	mitasendustri@hso3.kep.tr
<b>PHONE NUMBERS</b>	0312 296 20 00

## V. PRINCIPLES ON PROCESSING PERSONAL DATA

Our Company processes personal data under the rules and procedures of 6698 numbered Law on Protection of Personal Data and other Laws.

Our Company follows the below principles when processing personal data ( KVKK Article 4 / General Principles):

- To be in line with the Law and honesty,
- To be correct and up to date, if necessary,
- To process for specified, clear, and rightful purposes,
- To be relevant, limited, and consistent to the processing purposes.
- To be preserved for the required time according to the processing purpose and relevant regulations.

Our Company, when processing personal data, considering the above-stated principles, acts based on the law and honesty rules, correct and up-to-date transparency principles. In this context, our Company, with this Policy and other document announces the purpose of using collected personal data, methods for collecting these data, and legal base for this, where these data transferred to and the rights of related persons.

Our Company processes personal data for specified, clear, and rightful purposes, and uses these data in line with and to the extent the processing purposes. We keep away from processing personal data rather than the required purpose and nonessential personal data. Personal data that is available within our Company is kept for the required time accordingly with the purpose of processing and by the relevant regulations.

As per the 5<sup>th</sup> article of the 6698 numbered Law on Protection of Personal Data, personal data cannot be processed without the explicit consent of the relating person, however, as per the 2<sup>nd</sup> clause of the same article it is stated that in certain cases personal data can be processed without explicit consent. For the following cases, our Company can process and transfer personal data under 5/2 of KVKK without explicit consent.

- If required clearly by Law,
- In the event that it is necessary to protect the body integrity or life of the relating person or others whose explicit consent is not accepted by Law, who is in no situation of explaining their consent due to physical obstacles.
- On the condition that a contract is established and execution of it requires processing personal data of the parties of the said contract.
- To fulfill the obligations of the Controller, processing personal data is being necessary.
- If the personal data has already been made public by the owner.
- Processing personal data being necessary to establish, use or protect any right.
- On the condition that the relating person's fundamental rights and freedom are protected that processing personal data is obligatory for the Controller's legitimate interests.

Race, ethnicity, political opinion, philosophical view, religion, sect, or other beliefs, outfits, membership of an association, a union or a foundation, health, sexual life, conviction, and security details, biometric and genetic information of persons are considered sensitive personal data.

Our Company take a very sensitive approach toward these data which may cause harm to persons if processed against Law, by taking necessary precautions determined by the Board and as per 6/3 article of the KVKK, can process these data without an explicit consent of persons ( or if necessary the relating persons' explicit content may be required)

## VI. PRECAUTIONS TO PROTECT PERSONAL DATA

Our Company takes all necessary technical and administrative precautions to enable that personal data of persons are processed in line with the Law and protected from unlawful access.

- **Technical Precautions**

Our Company regularly inspects the personal data it processes and the processing activities with the technical systems established. We have technical departments for the technical issues, and we hire the best personnel for it. We follow the technical developments, primarily the ones about cyber safety, and update our systems accordingly. We give utmost importance to access and authorization issues and review our personnel's authority and organize, as necessary. We apply access restrictions for the ex-employees and close off their accounts. Our antivirus systems use a software with firewall. As per the executed security activities, we make sure that detected flaws are eliminated.

- **Administrative Precautions**

Our Company fulfills the requirements of this Policy, all personal data documents, 6698 numbered Law on the Protection of Personal Data, and all other relevant regulations. In this regard, our Company creates institutional procedures, establishes contracts as per being the Controller or the Processor by ensuring data security rules, and by establishing confidentiality agreements increase data safety. We carry out periodical and from time-to-time random in-house inspections to determine the risks. We create an internal discipline for protecting personal data and carry out training and awareness activities for our executives and workers with access to the personal data.

- **Precautions for the sensitive personal data**

Our Company handles the "sensitive personal data" outlined in the 6<sup>th</sup> article of the 6698 numbered Law on the Protection of Personal Data. For this, we implement technical and administrative precautions that we have taken to protect personal data by considering the minimum measurements towards sensitive personal data outlined by the Board.

## **VII. METHODS FOR COLLECTING PERSONAL DATA AND LEGAL BASE**

We can collect or obtain personal data when our customers, potential customers, and other third parties disclose these data to us (for example, our customers may give us personal data of their workers, customers, family members, or persons of whom they collect personal data or relating persons' references. Public institutions or service providers that we receive services to carry out our contractual obligations may disclose personal data to us), or we may obtain personal data from those who connect to our Wi-Fi network, our use our website and our social media accounts, or we may obtain personal data if it is already publicly known personal data.

The personal data existing within our Company is processed and kept for the required time primarily by the 6698 numbered Law on the Protection of Personal Data, and 6102 numbered Law of Obligations, 4857 numbered Law of Labor, 5510 numbered Law of Social Security and General Health Insurance, 5651 numbered Law of Regulation of Broadcasts in the Internet and Battle with the Crimes via these broadcasts, 6361 numbered Law of Occupational Health and Safety, 4982 numbered Law of Right to Information Act, 3071 numbered Law of Petition Right, 2828 numbered Law of Social Services, the Regulations of Health and Safety Precautions in Workplaces and their Additions, the Regulation of Archive Services, and other secondary directives as per aforementioned laws and regulations.

We can collect automatically or with other methods and sources and keep as long as the legal periods the personal data that we require from you or you choose to share with us for the below purposes and reasons, or for our Company's legal interests, or carry out our contractual obligations, or fulfill legal requirements:

- All communications between you and departments of our Company,
- Verbal, written, or electronic applications to our Company,
- Partnership with a close relationship, affiliates, and third parties and institutions.



- Meetings and congresses,
- Public Institutions
- Application via the internet, SMS channels, social media,
- Companies from which we receive supportive services,
- Real persons or legal entities that we carry out the transaction as per all manner of regulations or contracts,
- Public data.

Apart from the aforesaid articles, if you use our website and approve, under our Policy of Cookies (see. Section XIV "Policy of Cookies") we may process your personal data through the cookies on our website.

#### **VIII. PROCESSED PERSONAL DATA**

The personal data that we collect, and process may variate according to the commercial and legal relationship between you and our Company.

In addition, your identity details, contact information, financial info, sensitive personal data, educational and visual data, family members' data may be processed for the required purposes and the time, as related, limited and restrained, and current, if necessary, and in line with the 5<sup>th</sup> and 6<sup>th</sup> articles of the 6698 numbered Law.

<b>PERSONAL DATA TYPE</b>	<b>EXPLANATION</b>
<b>CONTACT INFORMATION</b>	Information such as phone number, address, e-mail, company phone number and extension no, Company e-mail address, social media accounts, etc.
<b>SENSITIVE PERSONAL DATA</b>	If obtained, sensitive personal data as per the definition in the 6698 numbered Law. We may also process sensitive personal data with the relating a person's explicit consent or 6/3 article of KVKK to carry out certain services, activities, and our legal obligations.
<b>VISUAL AND AUDITORY DATA</b>	Photos, images, and videos.
<b>VEHICLE DATA</b>	Plate information
<b>LOCATION DATA</b>	GPS location
<b>FAMILY MEMBERS' DATA</b>	Family members of the relating persons (e.g. spouse, children, etc.) and data of persons to reach in emergencies.
<b>FINANCIAL DATA</b>	Invoices of financial transactions by the relating persons, credit card debt, interest rate, tax amount, dept and balance to be received, IBAN info, bank account information, etc.
<b>ELECTRONIC DATA</b>	Membership records, internet passwords, IP address, transaction security information, log records, etc.
<b>OCCUPATIONAL DATA</b>	Employer data of the relating persons, occupational union's data, registry no, etc.
<b>CUSTOMERS' DATA</b>	Inquiries, orders, instructions, complaints, product range, likes, cookies records, customer number, occupational data, educational data of the customers, and so on.
<b>EDUCATION DATA</b>	Copy and grade of diplomas, etc.

<b>DATA OF REFERENCES</b>	Identity and contact information of the real persons given as a reference by the relating persons.
<b>TRAVEL DATA</b>	Flight information, route of the tour, accommodation information, etc.
<b>MARKETING DATA</b>	Statistics, evaluation, and reporting activities carried out based on the relevant persons' likes and interests, surveys, customer satisfaction forms, data obtained within the marketing and publicity, etc.
<b>LEGAL RECORDS</b>	Data existing in the documents of the directorate of dept collection by the decision of courts and administrative authorities, and documents and records we must keep as per our legal obligations.
<b>COMPANY DATA</b>	Address and details of companies (private companies)
<b>SECURITY DATA</b>	Entry-exit information to the workplace, meeting records, visit hours and details, camera records, etc.)
<b>DATA OF APPLICANTS</b>	Personal background, interview notes, test results, habits, etc.
<b>INSURANCE DATA</b>	Insurance Policy, premiums, compensation, and such data
<b>DATA OF APPLICATION/COMPLAINTS MANAGEMENT</b>	In the case of complaints/applications submissions to our Company, the inquiries and relating personal data.

**IX. PURPOSE OF PROCESSING PERSONAL DATA**

The Company can process personal data for the below purposes for the required time by the Law:

**A. LEGAL OBLIGATIONS**

- To comply with any legislation, regulation, or occupational institutions with which we have a membership,
- As with many other professional service providers, we are subject to laws, regulations, and occupational obligations. To make sure we provide services in line with these obligations we must keep certain records which may include personal data.
- To execute the orders by the judicial, administrative, and legal authorities and directorates of debt collection.
- Manage inspection activities for the Company.

**B. LEGAL OBLIGATIONS DUE TO CONTRACTS**

To execute the wide range of professional products and services that we provide (for more information on our services visit [www.mitasindustry.com](http://www.mitasindustry.com)), our Company processes personal data only to serve the relating person or his/her employer or for the customers (potential) with which the relating person have a contract.

- Personal data is processed and transferred by our Company to the related authorized persons or institutions in order to carry out necessary works by the our departments to realize our commercial activities and execute work processes related to these, ensure sustainability of our institution and work, plan and exercise activities, carry out advisory and publicity works in relation to our customers' likes, user habits and needs, plan and execute customer satisfaction activities, establish information

technologies infrastructure, ensure correctness and currency of the personal data processed by our Company under its contractual obligations, carry out inspection and ethics actions, and execute our activities as per the policies, and procedures of the Company.

### **C. LEGITIMATE INTERESTS OF OUR COMPANY**

- Management, administration, and development of our activities and services: we process personal data to manage our relationships with the customers, to fulfill our administrative, accounting, and institutional responsibilities, to maintain and utilize our IT systems, to develop our business and services, to host various events, manage our systems and applications, and to carry out our business inclusive of the followings:
- Processing personal data to manage our relationship with the suppliers, and subcontractors, and real persons related to them, to manage contracts, to get service from our suppliers, and when necessary to provide professional service to our customers,
- To ensure that personal data is current,
- To ensure, security, quality, and risk management within the scope of internal quality and risk analysis, and to protect our own information and customers' information,
- To evaluate customer satisfaction and service quality,
- To establish communication for celebrations and congratulations.
- To carry out processes and transactions, financial operations, communication, market research, and purchasing activities (inquiry, bid, evaluations, order, budgeting, contracts) to define and realize the Company's strategies.

### **D. ESTABLISHMENT OF LEGAL AND COMMERCIAL SECURITY OF PERSONS WITH WHOM WE HAVE A BUSINESS RELATIONSHIP**

- To carry out our obligations to inform the authorities due to regulations.
- To carry out legal activities.
- To check visitors' identity cards to ensure security and provide visitors' tags.

### **E. COMMUNICATION AND RELATED OPERATIONS**

- To establish communication with related persons.
- To ensure that the details of relevant persons' information are updated.

### **F. MANAGEMENT OF HUMAN RESOURCES POLICIES**

- Collecting data to carry out employment process which includes resumes sent via e-mail or other social media channels to the HR department as well.
- to finalize the employment process.
- to evaluate potential applicants.
- to carry out human resources activities in accordance with the Human Resources Policy and to fulfill its obligations in terms of occupational health and safety.
- to execute our responsibilities (to our workers) due to labor contracts or relevant regulations.

### **G. ENTREPRENEURSHIP, SUSTAINABILITY, SOCIAL RESPONSIBILITY, INNOVATION, PRIVACY, RISK MONITORING, MODELLING, SCORING, SECURITY, AND ASSESSMENT ACTIVITIES**

- To assess, plan and carry out sales and marketing activities of our products and services.
- To realize our sustainability efforts.
- To increase our range of services.
- To develop our relationships with our customers and to carry out works to protect our Company's reputation.
- To plan and carry out social responsibility projects.
- To ensure in-house activities such as reporting, scoring, statistics, and evaluations ( by anonymization the data when necessary)

### **X. SHARING PERSONAL DATA**

Our Company can transfer personal data to third parties to meet its obligations base on the conditions outlined in the 8<sup>th</sup> and 9<sup>th</sup> articles of KVKK, and within the 6698 numbered Law on the Protection of Personal Data, and 6102 numbered Law of Obligations, 4857 numbered Law of Labor, 5510 numbered Law of Social Security and General Health Insurance, 5651 numbered Law of Regulation of Broadcasts in the Internet and Battle with the Crimes via these broadcasts, 6361 numbered Law of Occupational Health and Safety, 4982 numbered Law of Right to Information Act, 3071 numbered Law of Petition Right, 2828 numbered Law of Social Services, the Regulations of Health and Safety Precautions in Workplaces and their Additions, the Regulation of Archive Services, and other secondary directives as per aforementioned laws and regulations.

As per the 2<sup>nd</sup> clause of the 5<sup>th</sup> article and the 3<sup>rd</sup> clause of the 6<sup>th</sup> article of the Law, it is possible to transfer data without explicit consent. The Company, complying with the KVKK and the relevant regulation, by taking required security precautions outlined in the instructions, unless otherwise stated in the Law, or the relevant regulation, or the contract, if exists, signed with the Controller, by taking consent of the relating persons, when necessary, can transfer personal data to the third parties or companies with which it has a business relationship within boundaries of Turkey.

In addition, when necessary, by taking the explicit consent of persons, to ensure privacy, accessibility, integrity, and endurance of the hardware and software of the processing equipment, or to protect our company we may transfer your personal data by sharing surveillance records to companies such as manufactures, telecom services, postal/ transportation services, maintenance and users support services, data carrier, IT system maintenance companies, and for administrative purposes or to provide professional services to our customers and other companies that provide services to us or the building management, legal services and legal supports areas and during visitor/ employer entry-exit controls.

RECEIVER GROUP	DEFINITION AND PURPOSE
<b>Business Partners and Group Companies</b>	This means the distributors, suppliers, and other third parties with whom our Company executes various works and projects during its activities or who provide services to our Company. Personal Data is transferred to this receiver group if it is required openly in the Laws or as per legal obligations, or regarding an established contract or directly relating to its execution, having become public by the owner himself, being obligatory to establish a right, or for our company’s legitimate interests or if required, by taking your explicit consent.
<b>Shareholders and Company Authorities</b>	Means the Shareholders of the Company as real persons or legal entities, the Board, and other authorized persons. Personal data is transferred to this receiver group by taking your explicit consent as per requirements stated openly by the Law, or legal obligations in terms of activities of our Company or to maintain its management. If it is directly related to establish and execute a contract, and if it is already made public by the owner himself, if it is obligatory to establish a right or necessary for our Company’s legitimate interests.
<b>Suppliers and other companies providing services</b>	The third parties with the contractual relationships for service or product services. Personal data is transferred to this group if it is required by law openly, or as per legal obligations, or if it is directly related to establish and execute a contract, if it is necessary to establish a right, or for our Company’s legitimate interests or if it is required

<p><b>Authorized Public Institutions and Organizations by Law.</b></p>	<p>Authorized public institutions and organizations with the right to require information and documents as per establishment laws and personal data can be transferred to these as per the 8th and 9th articles of KVKK, complying with the 4th article of the same Law. Sometimes personal data can be transferred to these especially to maintain the public order and other safety reasons as well as to fulfill our legal obligations or to maintain our legitimate interests.</p>
<p><b>Private Persons and Institutions Authorized by Law</b></p>	<p>This means the private persons and institutions to require information and documents as per the laws. Personal data is transferred to this group if it is required openly by the law or if it is a legal obligation, or if required directly to establish and execute a contract, and this group can use personal data within the lawful authorization.</p>

Your personal data will be transferred abroad only if you give explicit consent, otherwise within the permission of the Law, or if sufficient protection exists in the subject country as per the Law on the Protection of Personal Data. If there is not sufficient protection, personal data is transferred provided that our Company along with the Controller in the subject country issue a written guarantee to ensure sufficient protection and by the approval of the Board. When we transfer your data, we ensure the protection of your personal data by executing data transferring agreements as per KVKK standards with the receivers abroad.

**XI. PROTECTION OF PROCESSED DATA**

We will keep your personal data for the longest period of the following:

(i) for the required time according to the purpose of the processing (ii) for the time and necessity required by the laws (iii) expiry of obligation period to file lawsuits or investigations arisen from our services (iv) preservation period as per our Company’s applications or rules of the sector.

When the relating preservation periods expire, personal data will be demolished, erased, or anonymized.

**XII. DEMOLITION OF PERSONAL DATA**

All the details and preservation periods for the demolition of personal data can be found in the Policy on the Preservation and Demolition of Personal Data.

The company processes personal data in line with the Laws and accordingly with the preservation periods as outlined in the regulations. However, if the regulations do not specify a preservation period for the personal data, we will keep it until the processing purpose ends or until the necessary time for the requirements of the commercial life and as per our experience.

Our Company ensures ex officio data demolition activities by using the best appropriate method (erasing, demolishing, or anonymizing) when the preservation periods of personal data. Demolishment may also be required by the 11<sup>th</sup> article of KVKK.

**XIII. DATA SECURITY**

As per the 12<sup>th</sup> article of KVKK, to protect your personal data from a loss, misuse, change or mistakenly damage we make sure proper technological and organizational controls are carried out.

Our personnel with access to your data are trained to protect your privacy. Their access to your personal data is only permitted as per their responsibilities and to the necessary extent. These persons are also subject to strict privacy rules.

To ensure our security defense measures are well effective against the newest threats, we check and test them regularly.

**XIV. COOKIE POLICY**

Your visit to our website may result in processing your personal data via cookies. Cookies are small text files placed on your computer by the websites that you have visited. For more information, please view our Cookie Policy: [Cookie Policy](#)

## **XV. CCTV (CLOSED-CIRCUIT TELEVISION)**

We operate a CCTV monitoring system throughout our Company, and we centrally record and monitor the footage. Ownership and the management of the said system belong to the Company and are operated by the IT department.

CCTV is used to investigate and prevent crimes and ensure public and property safety. If necessary or required, these data may be shared with the relating persons or their representatives, service providers, the police, security institutions, or persons carrying out investigations.

Our Company executes CCTV (Closed Circuit Television) camera monitoring and recording activities as per the Law and regulations on the Private Security Services. The aimed purpose with these records is limited to the purposes outlined in this Policy, they are processed within general principles in line with the 4<sup>th</sup> article of KVKK and kept until the periods required by the Laws.

Our Company, as per fundamental rights and protection of freedom and transparency policy, can submit to the attention of relating persons by fulfilling its clarification obligation ( e.g. hanging warnings/plates on the walls – clarification on the spot, etc. ) as per 10<sup>th</sup> article of the KVKK.

## **XII. PROCESSING OF THE INTERNET ACCESS DATA WITHIN THE COMPANY BORDERS PROVIDED FOR EMPLOYEES AND VISITORS**

We provide internet access on our premises. Our Company can process or transfer personal data of the employees and the visitors who have used the internet access that we provide, to fulfill our safety and legal obligations and for other similar reasons following the explanations in this Policy.

We regularly keep the log records as per 5651 numbered law and other secondary regulations, and to carry out our legal responsibilities they are preserved as per the laws. This data is too shared, if requested, only with the authorized public institutions and organizations or the persons with the lawful authorization.

## **XIII. YOUR RIGHTS**

As per 6698 numbered Law on the Protection of Personal Data, by applying to the Controller, you may use the following rights:

- To have information as to your personal data is processed or not.
- If your personal data has been processed to require relating information
- To have information as to the purpose of processing your personal data and if it is used in line with this purpose.
- To get information on the national or international third parties to whom your personal data has been transferred.
- To demand correction if your processed personal data is incorrect or incomplete.
- Within the terms outlined in the 7<sup>th</sup> article of the Law, to require that your personal data be demolished or erased.
- In the event of correction/ erasing/ demolition/ anonymizing of your personal data to require that the third parties to whom your personal data has been transferred be informed of the aforesaid activities.
- To appeal to a situation resulting against you because of your personal data being exclusively processed or analyzed by the automatic systems.
- In the case that you have been harmed because of your processed personal data unlawfully, to require that the harm be indemnified.

As per the 28<sup>th</sup> article “Exceptions” of the 6698 numbered Law on the Protection of Personal Data, the terms of this Law shall not be applied for the following events and thus, persons cannot make claims for the followings:

- To process personal data for the real persons only to be processed for the activities concerning the relating person and family members living in the same residence, provided that the data security

obligations are fulfilled, and data are not transferred to third parties.

- To process personal data by anonymizing with an official statistic to be used for research, planning, and statistics purposes.
- To process personal data, providing that it does not threaten the national security and defense, public safety and order, economic safety, privacy of private life, human rights, or pose a crime, for the purposes of art, history, literature or science or within the right of speech.
- To process personal data in terms of preventive, protective, and intelligence activities by the public institutions and organizations authorized and assigned by the Law, to ensure national defense and security, public order and safety, or economic safety.
- To process personal data by the justice and enforcement authorities in relation to the investigation, prosecution, trial, or execution activities.

In addition, as per the 2<sup>nd</sup> clause of the 28<sup>th</sup> article of the Law, relating persons cannot claim the rights outlined in the 11<sup>th</sup> article of the KVKK, except for the right to get compensation for the harm:

- If personal data processing is necessary for preventing committing in crimes or investigation of crimes.
- Processing personal data which has been already made public by the relating person himself.
- If the personal data processing is necessary for inspection or regulation activities or the inspection and prosecution of disciplinary faults that are executed by the authorized public institutions or organizations and professional organizations with the public institution status.
- If processing personal data is necessary to protect the economic and financial interests of the Government in terms of budget, tax, and monetary issues.

As per KVKK or relevant regulations' terms, all applications concerning your Personal rights will be handled by our Company. If you wish to use any of your related personal rights, please kindly use this application form (click: **Relevant Person Access Inquiry Form**) and contact us at our KEP e-mail or [info@mitasindustry.com](mailto:info@mitasindustry.com) with the "Personal Data Application Inquiry Form" in subject. Meanwhile, you may use your e-mail in our records, or your electronic or mobile signature assigned by the 5070 numbered Law of Electronic Signature.

Company Name	Central Registr No.	KEP Address
Mitaş Endüstri San. Tic. A.Ş.	0-6080-4539-0700013	mitasendustri@hs03.kep.tr

Relating Persons must fill in the Relevant Person Access Inquiry Form (click: **Relevant Person Access Inquiry Form**) and submit a signed copy of it via a public notary to **ASO 2 Eskişehir Yolu 42. Km Alcı OSB Mah. 2001 Cad. No:19 Sincan Ankara**, or e-mail at [info@mitasindustry.com](mailto:info@mitasindustry.com). In order for a third party to execute activities on behalf of the relating person, a private duly Power of Attorney is required.

#### **XIV. CHILDREN AND OUR WEBSITE**

Our Company is aware of the fact that children's privacy must be protected, especially in the internet environment. Our website is not designed for children. Our Policy aims not to collect and keep personal data on purpose via our websites of anyone under 18 years old. If you are under 18, you must obtain the permission of your parents or executor to send any information via our internet site. Before sending any information, please ask them to view it.

#### **XV. AMENDMENTS, REVISION, AND ANNULATION**

We preserve our rights to make amendments in the Policy of Protection and Processing of Personal Data. If this Policy is to be changed to fulfill current applicable legal requirements, but not limited to these, the latest version of the relevant text will be announced on our website.

**XVI. ANNEX**

Annex -1: Relevant Person Application Form

**Version and Revision Date of the Policy: V.1.0 – 13.11.2019**