

CONFIDENTIALITY POLICY



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| **Document No.** | **:** AG.YK.S01.POL12 |
| **Publication Date** | **:** 12.10.2022 |
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CLARIFICATION TEXT ON PROCESSING AND PROTECTION OF PERSONAL DATA

At Altunkaya İnş. Nak. Gıda Tic. A.Ş., we take seriously the security of your personal data that you have provided to us either by using our website, filling out an application form or through other means. In this regard, as a company, we attach great importance to the processing and preservation of all types of personal data of all persons associated with the company, including those who use our products and services, in accordance with the Constitution of the Republic of Türkiye, the agreements to which our country is a party and Law No. 6698 on Personal Data Protection ("KVKK"). In full awareness of this responsibility and in the capacity of "Data Controller" as defined by the KVKK, we would like to inform you below about the purposes for which your personal data may be processed, the manner in which your personal data is collected, the legal purpose for which the data may be used and to whom the data may be disclosed.

Collection and Processing of Personal Data, and Reasons for Processing and the Legal Grounds Your personal data is processed by our company through various channels in accordance with legislation and company policies in order to carry out our activities, provide the products and services we offer within the established legal framework and fully and correctly fulfill the contractual and legal obligations of our company. Your personal data may be processed and transferred for the purposes stated in this explanatory text, within the framework of the conditions and purposes of the processing of personal data referred to in Articles 5 and 6 of the KVKK, and in accordance with the principles stated in the KVKK.

However, your personal data may vary depending on the services provided by our company and the commercial activities of our company; your personal data may be collected and recorded orally, in writing or electronically through automatic or non-automatic methods for specific and legitimate purposes, in accordance with the KVKK, and the rules of law and honesty, in whole or in part, in connection with the purposes of processing, in a limited, measured, accurate and up-to-date manner, by the entities and offices of our company, the companies of the Group, the business partners of our company and Altunkaya Group, employees, suppliers, subcontractors, service assistants, our company's website, social media channels, mobile applications and similar means.

Your personal data may be updated and processed as long as you use the products and services offered by our company and the companies in our group.

If you visit our company or our website to use the services of our company or our group companies, if you participate in training, seminars or organizations organized by our company, your personal data may be processed for the purposes and to the extent mentioned above, but not limited to these.

Your personal data is collected by our company and our group companies through various channels and on the basis of various legal grounds in order to improve the products and services we offer and to carry out our commercial activities. Your personal data collected on this legal basis will be processed in accordance with the conditions and purposes of the processing of personal data set forth in Articles 5 and 6 of the KVKK No. 6698.

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\* To whom and for what purpose the processed personal data can be transferred: Your collected personal data may be transferred to, stored, rearranged and classified at our business partners, suppliers, Group Companies, Company officials, shareholders, employees, supervisory authorities, subcontractors, performance assistants, legally authorized public institutions and private persons, domestic and foreign third parties within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the KVKK to carry out the necessary work to get you to benefit from the products and services offered by our Company and our Group Companies, to recommend the products and services offered by our Company and our Group Companies to you by customizing them according to your likes, usage habits and needs, to ensure the legal and commercial security of our Company, our Group Companies and persons who have a business relationship with our Company (Administrative operations for communication carried out by our Company), for the purposes of ensuring the physical security and control of the Company's locations, determining and implementing commercial and business strategies and ensuring the execution of our Company's human resources policies.

Protection of Children's Privacy Our company takes the protection of children's privacy seriously. We operate the Sites in compliance with all applicable laws in the countries listed below. We do not collect personally identifiable information from persons under the age of sixteen (16) or, if permitted by applicable law, under the age of thirteen (13). Children under the age of sixteen (16), or under the age of thirteen (13) if permitted by applicable law, must have the consent of a parent or guardian before submitting Personal Information to the Site. If we determine that the user is a minor at the time of collection, we will not use or process that person's Personal Data without the consent of the parent or guardian. However, without such consent, the child may not be able to participate in certain activities. A parent or guardian may review, delete, amend, or opt-out of further collection or use of their child's personal information by contacting us and using one of the options listed in the “Managing Your Personal Information” section (please include the child's name, address, and email address).

Personal Data Protection Precautions Protection of personal data is an important issue for our company. Our company takes the necessary measures to protect personal information from unauthorized access or loss, misuse, disclosure, alteration or destruction of such information. Our company is committed to keeping your personal information confidential, taking all necessary technical and administrative measures to ensure confidentiality and security, and exercising due care. Despite the fact that our Company takes the necessary information security measures, our Company will notify you and the Data Protection Authority immediately in the event that personal information is damaged or seized by third parties as a result of attacks on the Website and the System.

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Rights of the Personal Data Owner as listed in Article 11 of the KVKK Your rights are regulated in Article 11 of the KVKK No. 6698. In this context, the owners of personal data are entitled;

* + To know if their personal data is processed or not,
  + To request information if their personal data has been processed,
  + To know the purposes for which personal data is processed and whether it is used in accordance with the intended purpose,
  + To know about the third parties to whom personal data is communicated, whether in the country or abroad,
  + To request the rectification of personal data in case of incomplete or inaccurate processing and to request the communication of the transaction carried out in this framework to third parties to whom personal data is communicated,
  + To request the erasure or destruction of personal data in the event that the reasons for their processing cease to exist, although having been processed in accordance with the provisions of the KVKK Law and other relevant laws, and to request the communication to third parties to whom personal data has been communicated of the transaction carried out under this framework,
  + To object to the fact that the analysis of the processed data solely by automated systems leads to a result that is detrimental to the data subject,
  + To obtain compensation for the damage suffered caused by unlawful processing of personal data.
  + Pursuant to Article 13(1) of the KVKK No. 6698, you may, at any time, submit a request in writing or by any other means determined by the Personal Data Protection Board to our company to exercise your above-mentioned rights. Because the Personal Data Protection Board has not yet established a procedure, you must submit your request in writing to our Company in accordance with the provisions of the KVKK. In this regard, the ways and procedures for submitting your written request to our company under Article 11 of the KVKK are explained below.
  + In order to exercise your rights mentioned above, you can send your request containing the required ID information and your explanations regarding the right you wish to exercise with reference to the rights specified in Article 11

of the KVKK by filling out the form at [www.altunkayagroup.com](http://www.altunkayagroup.com/) , and sending a signed copy of the form to Başpınar Organize

O.S.B Mah. O.S.B. 4. Bölge 83409 nolu cad. No3 Şehitkamil Gaziantep along with ID documents, or send it by other methods specified in the KVKK, or send the relevant form with secure electronic signature to  [info@altunkaya.com](mailto:info@altunkaya.com) .

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