

GENERAL INSTITUTIONAL CLARIFICATION TEXT ON THE PROCESSING OF PERSONAL DATA

We the Dalbudak Corap Sanayi be Ticaret Ltd. Sti (“Dalbudak Corap”) have prepared this clarification text in order to inform our Visitors, Online Visitors, Clients, Potential Clients, Supplier Employees, Supplier Managers on the processing, recording and transmitting of your personal data within the framework of the Law on the Protection of Personal Data no. 6698 (“KVKK”) and on the activities pertaining from the related legislation and all legal regulations.

1) Which personal Data Categories Are We Processing and For Which Objective Are We Processing Them?

In accordance with the principles stipulated by the Article 4.2 of the KVKK, your personal data may be processed on the condition of:

- (i) Being compliant with law and the rules of honesty,
- (i) Being correct and when necessary, actual,
- (iii) Processing for defined, clear and legitimate objectives,
- (iv) Remaining moderate, related and limited to the objective of processing,
- (v) Preserving for the duration of time stipulated by the related law or the necessary time for the objective of processing.

Within the extent of the ongoing business relations established with our business partners for the objectives stated below (*it is possible for one person to pass into more than one category*):

A. Our Visitors

The identity data (e.g. *name, surname*) of our visitors and the physical space security data (e.g. *camera recordings*) will be processed in order to;

- a) Create a visitor records and following them up,
- b) Ensure the security of the physical space.

B. Our Online Visitors

The data processing security data (e.g. *your IP address data*), marketing data (e.g. *shopping history data, cookies*) and (*in case you let us know about them**) the ID data, communication data (e.g. *your e-mail address*) of our online visitors using our website will be processed in order to:

- a) Carry out activities in accordance with the legislation,
- b) Carry out data security processes,
- c) Follow up requests/claims,
- d) Carry out communication activities,
- e) Inform the authorized persons, institutions and organizations,
- f) Ensure your access to our website.

C. Our Clients

The identity data, communication data, client processing data (e.g. *order data*), physical space security data, finance data (e.g. *balance sheet data*), legal procedures data, marketing data (e.g. *shopping history data*) of the managers or employees of our clients as real or legal persons will be processed in order to:

- a) Carry out activities in accordance with the legislation,
- b) Carry out finance and accounting activities,
- c) Carry out and audit business activities,
- d) Carry out logistics activities,
- e) Carry out after sales support activities for goods/services,
- f) Carry out sales processes for goods/services,
- g) Run marketing analysis works,
- h) Carry out contract processes,
- i) Inform authorized persons, institutions and organizations,
- j) Ensure physical space security,
- k) Solve legal conflicts,
- l) Carry out preservation and archive activities
- m) Run risk management processes,
- n) Carry out loyalty processes for company's goods/services,
- o) Carry out communication activities.

D. Our Potential Clients

The identity data, communication data, client processing data, physical space security data, marketing data of the managers and/or employees of our potential clients as real or legal persons will be processed in order to:

- a) Manage sales processes for goods/services,
- b) Carry out contract processes,
- c) Ensure physical space security,
- d) Run marketing analysis works.

E. Our Supplier Employee

The identity data, communication data, physical space security data, professional experience data (e.g. *professional training data*) of our supplier employee will be processed in order to:

- a) Carry out communication activities,

- b) Carry out and audit business activities,
- c) Ensure physical space security,
- d) Manage supply chain management processes,
- e) Carry out logistic activities,
- f) Carry out activities in accordance with the legislation,
- g) Carry out occupational health/safety activities.

F. Our Supplier Manager

The identity data, communication data, physical space security data, client process data, finance data, marketing data, legal procedure data of our real person suppliers or the managers of our legal person suppliers will be processed in order to:

- a) Carry out and audit business activities,
- b) Carry out purchasing processes for goods/services,
- c) Carry out finance and accounting works,
- d) Carry out contract processes,
- e) Carry out investment processes,
- f) Ensure physical space security,
- g) Follow up and carry out legal works.

2) Which Ways Are Used in Order to Collect Your Personal Data?

Your personal data stated above as categories are collected through physical instruments such as order forms, contracts, visitor forms or through data systems and electronic devices (e.g. telecommunication infrastructure, computers and phones), third parties (e.g. *KBB* and *Findeks*), our website and other documents submitted by the related person, by automatic or non-automatic ways.

3) What is the Legal Reason for Collecting Your Personal Data?

Your personal data is processed by Dalbudak Corap for the objectives stated above, based on these legal reasons stated on the Article 5 of the KVKK:

- (i) They are clearly stipulated by the laws,
- (ii) On the condition of being directly related to making or execute an agreement/contract, it is necessary to process the personal data belonging to the contracting parties,
- (iii) It is obligatory to process data for the data controller to execute its legal obligation,
- (iv) It is obligatory to process data in order to establish, use or protect a right,
- (v) On the condition of not bringing harm to the basic rights and liberties of the related person, it is obligatory to process data for the data controller's legitimate benefit.

4. Do We Transfer Your Personal Data To Third Parties?

a) Personal data belonging to our visitors may be shared with the law enforcement and legal institutions in order to solve legal conflicts and in case they are requested on the basis of the related legislation.

b) Personal data belonging to our online visitors may be shared with legal institutions and authorized public institutions and organizations in order to solve legal conflicts and in case they are requested on the basis of the related legislation.

c) Personal data belonging to our clients are transferred to the authorized public institutions and organizations in order to carry out activities in accordance with the laws, to follow up and carry out legal works, to inform authorized persons, institutions and organizations; and to our group companies, IT company, suppliers, cargo companies, insurance companies, banks and our public accountants to the necessary extent and within the scope permitted by the legal regulations, to carry out and audit business activities, to carry out risk management processes, and to execute our services with due diligence. Moreover the subject matter personal data may be transferred to the law office working for us and to the legal institutions for these to be used as evidence in case of any possible legal conflicts arising in the future.

d) Personal data belonging to our potential clients may be transferred to the law office working for us and the legal institutions for these to be used as evidence in case of any possible legal conflicts arising in the future.

e) Personal data belonging to our supplier employee are transferred to the authorized public institutions and organizations within the scope permitted by the legal regulations to carry out activities in accordance with the laws, to follow up and carry out legal works, to inform authorized persons, institutions and organizations, to carry out and audit business activities; and within the necessary extent to group companies, IT company, suppliers, cargo companies, banks and to our public accountant in order to execute our services with due diligence. Moreover the data in question may be transferred to the law office working for us and to the legal institutions for these to be used as evidence in case of any possible legal conflicts arising in the future.

f) Personal data belonging to our supplier manager are transferred to the authorized public institutions and organizations within the scope permitted by the legal regulations to carry out activities in accordance with the laws, to follow up and carry out legal works, to inform authorized persons, institutions and organizations, to carry out and audit business activities; and within the necessary extent to group companies, IT company, suppliers, cargo companies, banks and to our public accountant in order to execute our services with due diligence. Moreover the data in question may be transferred to the law office working for us and to the legal institutions for these to be used as evidence in case of any possible legal conflicts arising in the future.

5) Are We Transferring Your Personal Data Abroad?

Dalbudak Corap does not transfer your personal data abroad.

6) How Can You Use Your Rights Related to Your Personal Data?

You can send your requests within the scope of the Article 11 on the rights of the related persons of the KVKK with the “Data Controller Application Form” prepared to help you in accordance with the “Announcement on the Procedures and Principles of Application to the Data Controller” located on the address: <http://www.sev-alsocks.com/>” belonging to Dalbudak Corap

Data controller: Dalbudak Corap Sanayi ve Ticaret Ltd. Sti

Address: Adnan Kahveci Mahallesi Harbiye Caddesi No: 28 Dalbudak Corap Binası
Beylikduzu/ İstanbul

Mail: kvkk@dalbudakcorap.com