



# Personal Data Protection and Privacy Policy

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## 1. PURPOSE

Being Akcoat İleri Kimyasal Kaplama Malzemeleri Sanayi ve Ticaret A.Ş (“**Akcoat**”), we attach great importance to the protection of personal data. Within this context, we take care to lawfully process and protect the personal data of Akcoat's and/or Akcoat's employees, visitors, sponsors, business partners, officials, candidate employees, interns, suppliers, employees and officials of the corporates/sponsors/suppliers with whom/which it cooperates, third parties and including but not limited to other persons those listed here (hereinafter referred to as “**Relevant Person**” or “**Relevant Persons**”) in accordance with the law.

Hereby Akcoat’s Personal Data Protection and Privacy Policy (“**Policy**”) has been prepared for processing the personal data that our Company will process while carrying out its activities by the Personal Data Protection Law No.6698 (“**PDPL**”) and other relevant legislative provisions and the law. Besides, the Policy aims to make the lawful processing of personal data a policy and to ensure transparency by informing Relevant Persons about the personal data processed by our Company. Within this context, being Akcoat we process personal data within the framework of the following principles and rules as specified in detail in the Policy:

- In accordance with Article 4 of the PDPL, personal data is processed for specific, clear, and legitimate purposes in accordance with the law and the rules of honesty, kept accurate and up-to-date both physically and electronically within our company, and stored in connection with the purpose for which they are processed, in a limited and moderate manner and for a period stipulated in the relevant legislation or necessary for the purpose for which they are processed.
- The required administrative and technical measures set out in Article 12 of the PDPL are taken.
- In accordance with Article 20 of the Constitution and Article 10 of the PDPL, the Relevant Persons are informed and clarified about the purpose for which personal data will be processed during the collection of personal data, to whom the processed personal data can be transferred and for what purpose, the method and legal reason for collecting personal data, and they are enlightened and informed about the rights of the Relevant Persons within the scope of Article 11 of the PDPL.

- The express consent of the relevant individuals shall be obtained for the processing of personal data, as necessary in accordance with Article 20 of the Constitution and Article 5 of the PDPL
- Our company shows due sensitivity to the processing and protection of private personal data in accordance with Article 6 of the PDPL.
- Necessary methods are established within our company for Relevant Persons to be able to exercise their rights set out within the scope of Article 11 of the PDPL.
- Our company complies with the legislation and the PDP Board regulations in transferring personal data to third parties in the country or abroad in line with the requirements of the purpose of processing in accordance with Articles 8 and 9 of the PDPL.
- In accordance with the provisions of Article 7 of the PDPL and the Regulation on Deletion, Destruction or Anonymization of Personal Data, our Company deletes, destroys, or anonymizes personal data ex officio or upon the request of the Relevant Person, in case the reasons requiring the processing of personal data disappear. Within this context, a Personal Data Storage and Destruction Policy has been prepared.

## **2. SCOPE**

The Policy applies to all personal data of Relevant Persons processed through automated or non-automated means within any data recording system. Akcoat primarily processes personal data via printed documents, telephone, website, online services, email, social media, and other similar channels, as well as verbal, written, or electronic platforms.

## **3. IMPLEMENTATION AND ENFORCEMENT**

The processing and protection of personal data will primarily be set out within the framework of PDPL and other legislation in force. Since legislative provisions may change over time, our Company may update the Policy by making changes to it from time to time. Being Akcoat, we accept that the legislation in force shall apply in case of any discrepancy between the legislation in force and the Policy.

The Policy prepared by Akcoat came into force on 29/09/2020. The Policy is published on our Company's website [www.akcoat.com](http://www.akcoat.com) and transmitted to the Relevant Persons upon their

request. If there is any change in the Policy, the effective date of the Policy and relevant articles shall be updated accordingly.

#### **4. OUR PRINCIPLES**

Our company processes personal data within the framework of the following principles set out in Article 4 of the PDPL.

##### **a. Processing in accordance with the Law and Good Faith**

Our company acts in accordance with the Good Faith, PDPL, and other relevant legislation while processing personal data. Personal data is never collected or processed without the knowledge of the Relevant Person. Personal data is not used in a way that would cause injustice to the Relevant Person or exceed the purpose of collecting personal data. Personal data is processed moderately and proportionately for collection.

##### **b. Ensuring Personal Data is Accurate and Up to Date When Necessary**

Our company ensures that the personal data that it processes are correct and up-to-date, considering the fundamental rights of the Relevant Persons and their own legitimate interests. It takes the necessary measures accordingly. Within this context, it has created a system to ensure that the information of Relevant Persons is correct and up-to-date.

##### **c. Processing for Specific, Clear and Legal Purposes**

Our company processes personal data for legitimate purposes in accordance with the Good Faith. In this respect, it shows sensitivity to the principle of certainty and clarity in the legal texts (explicit consents, clarifications, etc.) prepared within the scope of personal data processing law. It prefers clear and plain expressions that can be understood by the Relevant Person, instead of legal and technical terminology that can only be understood by subject matter experts. Thus, Relevant Persons can easily understand the purpose for which their personal data is processed. Our Company informs the Relevant Person during the processing of personal data about the purpose for which personal data will be processed.

**d. Being Related, Limited and Moderate to the Purpose for Processing**

Our company processes personal data only for a specific and valid purpose and does not process personal data for purposes that do not exist at the time of processing personal data but are thought to occur in the future. For example, it does not use the personal data, that it processes for sales purposes, for marketing purposes later, and it provides different information to the Relevant Persons if personal data will be processed for different purposes. In addition, personal data that goes beyond the purpose is not processed.

**e. Preservation for the Period Stipulated in the Relevant Legislation or Required for the Purpose for which they are Processed**

Our company stores personal data only for the period specified in the relevant legislation or required for the purpose for which it is processed. Firstly, it is determined whether the relevant legislation stipulates a period for storing personal data. If such a period is determined, our Company acts in accordance with this period, and if a period is not determined, our Company stores personal data for the period required for the purpose for which they are processed. In case the period expires or the reasons requiring processing disappear, the personal data is deleted, destroyed, or anonymized by our Company. Personal data is not stored for the possibility of any necessity that may arise later.

**5. DATA SECURITY**

In accordance with Article 12 of the PDPL, our company takes the necessary technical and administrative measures to ensure the appropriate level of security to prevent unlawful processing and access of the personal data that it processes and to ensure the protection of the data in accordance with the law.

Within this context, it carries out the necessary inspections within its structure or has them carried out in accordance with Article 12 of the PDPL. As a result of these inspections, any nonconformities determined within the scope of the Company's internal functioning are reported to the relevant department, and the necessary activities are carried out to improve the measures taken.

Our company has established and activated a system that ensures that if personal data is obtained by others through unlawful means, this situation is notified to the Relevant Person

and the PDP Board as soon as possible. If deemed necessary by the PDP Board, this situation may be announced on the PDP Board's website or by another method.

The main technical and administrative measures taken to prevent the unlawful processing of personal data, unlawful access to these data and to ensure the lawful storage of personal data are listed below:

- Technological investments to ensure the security of personal data are planned by determining the costs of such investments.
- Personnel who know technical matters are employed.
- Software and hardware that contain virus protection systems and firewalls are installed.
- Proper backup programs are used to ensure that personal data is stored securely.
- Employees are informed and trained on personal data protection law, the lawful processing of personal data and the measures to be taken to prevent unlawful access to personal data.
- All activities carried out by our company were analyzed in detail for all business units, and as a result of this analysis, the activities carried out by the relevant business units were reflected in a detailed and process-based personal data inventory.
- Studies have been initiated throughout the Company to fulfill our legal obligations within the framework of the inventory, the Company documents have been examined in terms of PDPL the required changes have been made to these documents and the missing documents have been prepared.
- Access to personal data and authorization processes are designed and implemented within the Company in accordance with the legal requirements in the inventory.
- Provisions stating that the persons to whom personal data are transferred will take the necessary security measures to protect personal data and ensure that these measures are complied with in their organizations are added into the contracts concluded by our company with persons to whom personal data is transferred in accordance with the law.
- Our visitors are informed in accordance with PDPL and their explicit consent is taken before processing their personal data.

## **6. METHOD OF PROCESSING PERSONAL DATA**

Your personal data is collected through which our Company or organizations and individuals authorized to represent our Company, such as support service organizations, communicate with you or may contact you in the future including our companies, website, written/digital applications made to our Company and other websites, telephone calls, e-mail correspondence, organizations to the extent permitted and within the limits set by the relevant legislation and agreements, with also your consent in cases where it is legally required.

Your personal data collected through these methods can be processed and transferred for the purposes specified in this article of the Policy within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of Law No.6698.

In addition, your personal data can be processed through cookies used on our website [www.akcoat.com](http://www.akcoat.com). You can prevent the installation of cookies by adjusting your browser settings according to this. This may cause you not to be able to use all services to their full extent.

Our company informs the Relevant Persons during the obtaining the personal data, in accordance with Article 10 of the PDPL and the provisions of the Disclosure Communique. Within this context, our Company clarifies by informing regarding Akcoat and the identity of its representative, if any, the purpose for which personal data will be processed, to whom and for what purpose the processed personal data can be transferred, the method and legal reason for collecting personal data, and the rights of Relevant Persons within the scope of Article 11 of the PDPL. Our Company informs the Relevant Persons which Relevant Person groups' personal data that it processes, the purposes of processing the Relevant Person's personal data, and the storage periods, within the scope of the clarification obligation in accordance with Article 10 of the PDPL.

Another condition for processing personal data is the express consent of the Relevant Person. In cases where explicit consent is required, our Company provides the Relevant Person the



opportunity to express his/her explicit consent on a specific subject, based on being informed and with free will.

As a rule, our Company obtains the express consent of Relevant Persons in writing for the processing of personal data. However, in case of presence of any of the personal data processing conditions specified in Article 5/2 or Article 6/3 of the PDPL, the express consent of the Relevant Persons is not required. These conditions are explained below in detail.

**a. Being Stipulated by Laws**

In case the relevant activity regarding the processing of personal data is clearly stipulated by law, personal data may be processed without seeking the express consent of the Relevant Person.

(For Example, the documents requested from the employee to create the personnel file included in the Labor Law No.4857)

**b. Failure to obtain the express consent of the Relevant Person due to actual impossibility**

In case personal data processing by our Company is obligatory to protect the life or physical integrity of the Relevant Person or someone else, and in this case, the Relevant Person is unable to express his/her consent due to actual impossibility or legal invalidity, personal data may be processed without the express consent of the Relevant Person.

(For Example, Sharing the blood type information of the employee, who had an accident, with the workplace doctor)

**c. It's being directly related to the establishment or execution of the contract**

Personal data may be processed without seeking the express consent of the Relevant Person if it is necessary to process personal data of the parties to the contract, provided that the processing of personal data by our Company is directly related to and necessary for the establishment or execution of a contract.

(For Example, Recording the address information of the real person for delivery,)

**d. Company's fulfillment of its legal obligations**

Personal data may be processed without seeking the express consent of the Relevant Person in case the processing of personal data is obligatory for our Company, which is the Data Controller, to fulfill its legal obligations.

(For example: Processing of employees' personal data for the purpose of issuing a payroll)

**e. Personal data's being made public by the Relevant Person**

Personal data may be processed by our Company in a limited manner for the purpose of making it public without seeking the express consent of the Relevant Person provided that the personal data has been made public by the Relevant Person.

(For Example, the fact that the person announces his/her contact information to be reached in case of any emergency)

**f. Data processing is obligatory for the establishment or protection of a right**

Personal data may be processed without seeking the express consent of the Relevant Person in case personal data processing is obligatory for the establishment, exercise, or protection of a right.

(For Example, storing personal data that has the nature of proof such as contract, invoice, etc., throughout the legal period of limitations and using it if necessary)

**g. Processing personal data is obligatory for the lawful interest of our company**

Personal data of the Relevant Person may be processed if data processing is necessary for the legitimate interests of our Company if it does not harm the rights and freedoms of the Relevant Person.

(For Example, Processing of personal data regarding employee performance to implement rewards and bonuses that increase employee loyalty)

## **7. PROCESSING METHOD OF PRIVATE PERSONAL DATA**

Article 6 of the PDPL stipulated data regarding race, ethnic origin, political thought, philosophical belief, religion, sect or other beliefs, appearance and dress, association, foundation or union membership, health, sexual life, criminal conviction, and security measures as well as biometric and genetic data as private personal data and subjected the processing of these data to more sensitive protection.

Our Company informs Relevant Persons during obtaining the private personal data in accordance with Article 10 of the PDPL. Within this context, our Company makes clarification by informing regarding to Akcoat and the identity of its representative, if any, the purpose for which private personal data will be processed, to whom and for what purpose the processed private personal data can be transferred, the method and legal reason for collecting private personal data, and the rights of Relevant Persons within the scope of Article 11 of the PDPL. Our Company informs the Relevant Persons which Relevant Person groups' private personal data that it processes, the purposes of processing the Relevant Person's private personal data and the storage periods, within the scope of the clarification obligation in accordance with Article 10 of the PDPL.

Private personal data is processed by taking precautions in accordance with PDPL and by making/having necessary inspections. As a rule, another condition for processing private personal data is the express consent of the Relevant Person. Our Company provides with the Relevant Person the opportunity to express his/her explicit consent on a specific subject, based on being informed and with free will.

Another condition for processing personal data is the express consent of the Relevant Person. In cases where explicit consent is required, our Company provides with the Relevant Person the opportunity to express his/her explicit consent on a specific subject, based on being informed and with free will.

As a rule, our Company obtains the express consent of Relevant Persons in writing for the processing of private personal data. However, in accordance with Article 6/3 of the PDPL, the express consent of the Relevant Persons is not required in case of the presence of any of the conditions specified in Article 5/2 of the PDPL.

## **8. OUR PURPOSES FOR PROCESSING PERSONAL DATA**

Our company processes personal data to carry out the necessary works by our relevant business units in order to carry out the activities that we carry out and to conduct the related business processes; to ensure the legal, technical and commercial-occupational security of our Company and the Relevant Persons who have a business relationship with our Company; to plan and execute the Company's commercial and/or business strategies; to carry out the necessary works by our business units to enable Relevant Persons to benefit from the services provided by our company and to conduct the relevant business processes within the scope of planning and executing human resources policies and processes for the following purposes (including but not limited to these).

- Carrying out company activities
  - Planning and execution of corporate communication,
  - Planning and execution of Human Resources and occupational health and safety processes,
  - Ensuring the legal and commercial security of people who have business relations with our company,
  - Informing you of company innovations and activities,
  - Contacting you via our e-mail addresses on our website or the information that you submit through the form,
  - Carrying out invoicing and other accounting transactions for our services,
  - Ensuring security in business processes and necessary inspections such as planned periodic internal audit activities,
  - Ensuring the building security of the company headquarters,
  - Determining and implementing our company's commercial and business strategies,
  - Providing the service that you request,
  - Carrying out the legal processes of our company
  - Managing contractual processes and fulfilling contractual obligations,
  - Implementation and supervision of workplace rules,
  - Submitting offers regarding our services,
  - Measuring your satisfaction with our services and improving our services accordingly,
- Planning, auditing, and execution of risk management, corporate sustainability, corporate

management, strategic planning, and information security processes; ensuring business continuity.

- Conducting our finance, communication, market research, and purchasing operations,
- Maintaining in-company system and application management operations,
- Managing relationships with our sponsors, suppliers, and other business partners,
- Taking photographs and videos at organizations, managing marketing activities, publishing press releases, carrying out marketing activities carried out through the website together with the relevant suppliers, creating records of event participants,
- Fulfilling legal obligations arising from the legislation,
- Ensuring communication with Akkök Holding and Akkök Holding group companies in Turkey and carrying out the necessary activities and reporting activities,
- Ensuring the shipment of raw materials
- Managing processes at public institutions and organizations such as the Social Security Institution,
- Monitoring and preventing abuse and unauthorized transactions.

In line with the above purposes, it is seen that a large part of the activities and processes carried out by our Company enter into the scope of Article 5/2 and Article 6/3 of the PDPL and therefore do not require the express consent of the Relevant Persons. However, if the activities or processes carried out do not enter into this scope, the express consent of the Relevant Persons is obtained.

## **9. TRANSFER OF PERSONAL DATA**

Your personal data can be shared with our suppliers with which we cooperate and receive services for the performance of the service provided by our medical company., sponsors, business partners (software companies providing technical support services, companies providing auditing services, companies providing electronic commerce services, advertising agencies, car rental companies, etc.), private insurance companies (health, retirement and life insurance and etc.), Social Security Institution, the General Directorate of Security and other law enforcement forces, the Directorate General of Population, other relevant official institutions and organizations, the courts, your authorized representatives, the corporation

which you are associated with and/or work for, and third parties including lawyers, tax consultants and auditors as well as third parties, regulatory and supervisory institutions and official authorities, Akkök Holding group companies in the country, to which our Company is affiliated,. To the extent necessary to achieve the above-mentioned purposes and to fulfill obligations arising from the law, provided that it is limited to these purposes.

Your Personal Data may be stored and retained, and classified as required for market research, financial and operational processes and marketing activities, updated at different periods and transferred to 3rd parties and/or suppliers required by the service within the framework of the law and confidentiality principles, and/or service providers and/or our foreign shareholders to whom we are affiliated to the extent permitted by the legislation, and the information can be transferred, stored, processed by being reported, in accordance with the policies we are affiliated with and for reasons stipulated by other authorities, and the records and documents can be issued as a basis for the transaction in electronic or paper media and it may be transferred within the framework of Article 8 of the PDPL on the transfer of personal data and the personal data processing conditions and purposes specified in Article 9 regarding transfer of personal data abroad.

Our Company may transfer personal data and private personal data without the express consent of the Relevant Person, by taking adequate measures prescribed by the PDP Board, provided that the conditions in Article 5/2 and Article 6/3 of the PDP are met.

Your personal information will always be processed in confidence and will not be shared with third parties who do not act on our behalf unless you consent to the sharing of data in writing or electronically or unless the reasons under Article 5/2 of the PDP exist or we are legally obliged to do so.

Please also note that we may share your personal information with other global companies in our network for the purposes stated above, and within this context, we may use the existing technological products such as cloud information technologies to provide our services most efficiently.

## 10. PERSONS TO WHICH PERSONAL DATA IS TRANSFERRED AND THE PURPOSES OF TRANSFER

Our company informs the Relevant Person of the person groups to whom personal data is transferred in accordance with Article 10 of the PDPL. The persons to whom the transfer is made, the scope of these persons, and the purposes of data transfer are stated below.

PERSONS AND INSTITUTIONS TO WHOM/ WHICH TRANSFER WAS MADE	DEFINITION	PURPOSE OF DATA TRANSFER
<b>Business Partner</b>	It defines the parties with which our Company establishes business partnerships for purposes such as sales, promotion, and marketing of our Company's services, and after-sales support while carrying out its commercial activities.	As limited to ensuring that the purposes of establishing the business partnership are fulfilled.
<b>Sponsors / Visitors (children and their parents)</b>	It identifies the persons to whom our company provides services and/or employees/authorized signatories/other real persons in the companies to which it provides services.	As limited to providing service to our customers
<b>Supplier</b>	It defines the parties or the employees/authorities/other relevant persons of these parties who provide services to our Company on a contractual basis in accordance with the orders and instructions of our Company while our Company is carrying out commercial activities.	As outsourced by our company from the supplier and limited to the purpose of providing service to our Company.
<b>Legally Authorized Public Institutions and Organizations</b>	It defines public institutions and organizations that are authorized to receive information and documents from our Company in accordance with the provisions of the relevant legislation.	As limited to the purpose requested by the relevant public institutions and organizations within their legal authority
<b>Legally Authorized Private Legal Persons</b>	It defines private legal persons who are authorized to receive information and documents from our Company in accordance with the relevant legislation.	As limited to the purpose requested by the relevant private legal persons within their legal authority (E.g. Occupational Health and Safety Company)

## 11. STORAGE PERIODS FOR PERSONAL DATA

Our company stores personal data and private personal data for a limited period stipulated in the PDPL and other relevant legislation. Your above-mentioned personal data can be stored in both digital and physical environments by being transferred to the physical archives and information systems of our Company and/or our suppliers.

Personal data is stored for a period determined by considering the following criteria if a period is not specified in the legislation regarding how long personal data should be stored, and it is destroyed after this period:

- The period accepted as a general practice in the sector in which the data controller operates, within the scope of the purpose of processing the relevant data category,
- The period which requires the processing of personal data in the relevant data category and during which the legal relationship established with the relevant person will continue,
- The period during which the legitimate interest to be obtained by the data controller will be valid in accordance with the law and the Good Faith depending on the purpose of processing the relevant data category,
- The period during which the risks, costs and responsibilities that will arise from storing the relevant data category depending on the purpose of processing will legally continue,
- Whether the maximum period to be determined is suitable for storing the relevant data category correctly and up-to-date, when necessary,
- The period during which the data controller is obliged to store personal data in the relevant data category in accordance with its legal obligation,
- The limitation period determined by the data controller for asserting a right based on personal data in the relevant data category.

If the purpose of processing personal data has expired, and the storing periods determined by the relevant legislation and the Company have expired; personal data can only be stored to constitute evidence in possible legal disputes or to assert the relevant right based on personal data or to establish a defense. In establishing the periods herein, the limitation periods for asserting the mentioned right and the storing periods are determined based on the samples in the requests previously directed to our Company on the same issues, even



though the limitation periods have passed. In such a case, the stored personal data is not accessed for any other purpose and the relevant personal data is accessed only when it needs to be used in the relevant legal dispute. Here, personal data is deleted, destroyed, or anonymized after the mentioned period expires.

## 12. CATEGORIZATION OF PERSONAL DATA

In our company, personal data is processed under the categories shown in the following table.

CATEGORY OF PERSONAL DATA	DESCRIPTION
<b>Identity Information</b>	All information included in documents such as Driving Licence, Identity Card, Certificate of Residence, Passport, Lawyer Identity Card, Marriage Certificate
<b>Contact Information</b>	Information such as phone number, address, e-mail
<b>Customer Information</b>	Information obtained and produced about the relevant person because of the operations carried out by our business units within the framework of our services
<b>Family Members and Relative Information</b>	Information about the family members and relatives of the Relevant Person to protect the legal interests of the employees, Information about the families or relatives of the visiting children.
<b>Transaction Security Information</b>	Your personal data is processed to provide our technical, administrative, legal, and commercial security while carrying out our commercial activities
<b>Risk Management Information</b>	Personal data is processed through methods used in accordance with generally accepted legal, commercial practices and good faith in these areas for us to be able to manage our technical and administrative risks.
<b>Personnel Information</b>	All kinds of personal data are processed to obtain information that will be the basis for the formation of personal rights of our employees or real persons who have a working relationship with our Company.
<b>Employee Candidate Information</b>	Personal data processed related to the individuals who have applied to become employees of our Company or who have been evaluated as employee candidates in line with the human resources needs of our Company in accordance with commercial practices and good faith, or who have a working relationship with our Company.
<b>Vested Benefits and Interests Information</b>	Your processed personal data for planning the vested benefits and interests that we offer and will offer to employees or other real persons who have a working relationship with our Company, determining objective criteria for entitlement to these, and tracking their progress payments.

<b>Legal Action and Compliance Information</b>	Your personal data processed within the scope of determining and pursuing our legal receivables and rights and fulfilling our debts, as well as compliance with our legal obligations and our Company's policies.
<b>Audit and Inspection Information</b>	Your personal data processed within the scope of our Company's legal obligations and compliance with Company policies
<b>Private Personal Data</b>	Data specified in Article 6 of the PDPL
<b>Request Complaint Management Information</b>	Personal data regarding the receipt and evaluation of any requests or complaints directed to our company
<b>Incident Management Information</b>	Information and evaluations collected about events that have the potential to affect our company, its employees, and shareholders
<b>Audio/Visual Data</b>	Data included in photos and camera recordings, audio recordings, and copies of documents containing personal data

### 13. CATEGORIZATION OF RELEVANT PERSONS

Although the personal data of the Relevant Person categories listed below are processed by our Company, the scope of application of the Policy is limited to Relevant Persons. Descriptions of these people are given in the table below.

Although our Company's categories of Relevant Persons are within the scope stated above, persons outside these categories may also submit their requests to our Company within the scope of PDPL; The requests of these people will also be evaluated within the scope of the Policy

<b>CATEGORY OF RELEVANT PERSON</b>	<b>DESCRIPTION</b>
<b>Customer</b>	Real or legal persons being provided with services from our company
<b>Potential Customer</b>	Real or legal persons who have requested or are interested in benefiting from our services or who have been evaluated by the rules of practice and good faith rules as they may have this interest
<b>Visitor</b>	Real persons who have entered the physical facilities (office, factory, etc.) owned by our company or where it organizes an event for various purposes or who visit our websites

<b>Third-Party</b>	Third-party real persons who are associated with our company to ensure the security of commercial transactions between the above-mentioned parties or to protect the rights of the aforementioned persons and to obtain interests (E.g. guarantor, companion, family members, and relatives) or all real persons whose personal data our Company has to process for a specific purpose, even if it is not expressly stated within the scope of the Policy
<b>Employee Candidate</b>	Real persons who have applied for a job to our Company by any means or have made their CV and relevant information available for review by our Company.
<b>Group Company's Employee</b>	Representatives and employees of our company's Akkök Holding and Akkök Holding group companies located in the country.
<b>Company Official</b>	Members of our company's board of directors and other real persons authorized by our company (e.g. authorized signatories)
<b>Employees, Shareholders, and Officials of the Corporates with Whom/Which We are In Cooperation</b>	Real persons working in corporates (including but not limited to business partners, suppliers, etc.) with which our company has all kinds of business relations, including the shareholders and officials of these corporates

#### 14. PERSONAL DATA PROCESSING ACTIVITIES CARRIED OUT IN AKCOAT OFFICES

Security cameras are used to ensure the security of our company. Personal data processing is carried out by our Company using security cameras.

Our company aims to improve the quality of the service provided, to ensure its reliability, to ensure the safety of life and property of our Company, the Relevant Person, and other persons, to prevent abuses, and to protect the legitimate interests of these persons within the scope of surveillance activities with security cameras.

Personal data processing activities carried out by our company with security cameras are carried out in accordance with the Constitution, PDPL and other relevant legislation.

In accordance with Article 4 of the PDPL, our company processes personal data in a limited and moderate manner in connection with the purpose for which they are processed. The person's privacy is not subject to monitoring in a way that may result in interference that exceeds security purposes. Within this context, Relevant Persons are informed about the

personal data processing activities carried out. However, their explicit consent is not obtained due to our Company having a legitimate interest.

The necessary technical and administrative measures are taken by our company to ensure the security of personal data obtained because of camera monitoring activities in accordance with Article 12 of the PDPL.

#### **15. STORAGE OF RECORDS OF INTERNET ACCESS PROVIDED TO OUR VISITORS AT AKCOAT OFFICES**

Internet access can be provided to our visitors upon request during their stay in our buildings and Companies to ensure security by our company and for the purposes specified in the Policy. In this case, log records regarding your internet access are recorded in accordance with the imperative provisions of Law No.5651 and the legislation issued in accordance with this law; these records are processed only upon request by authorized public institutions and organizations or to fulfill our legal obligations during inspection processes to be carried out within the Company.

Log records obtained within this context can only be accessed by a limited number of Akcoat employees. Company employees who have access to the aforementioned records access these records only for use in requests or inspection processes from authorized public institutions and organizations and share them with legally authorized persons.

#### **16. DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA**

##### **a) Akcoat's obligation to delete, destroy and anonymize personal data**

In accordance with Article 138 of the Turkish Penal Code and Article 7 of the PDPL and Article 7 of the Regulation on Deletion, Destruction, or Anonymization of Personal Data, personal data will be deleted, destroyed, or anonymized based on our Company's own decision or the Relevant Person Upon request in case the reasons requiring processing are eliminated even though it has been processed in accordance with the provisions of the relevant law.

In the Policy, the concepts of deletion, destruction, and anonymization are used within the framework of the definitions in the Regulation on Deletion, Destruction, or Anonymization of Personal Data. Within this context, the Personal Data Storage and Destruction Policy has been prepared.

Our Company reserves the right not to fulfill the Relevant Person's destruction request in cases where it has the right and/or obligation to store personal data in accordance with Article 5/2 of the PDPL.

## **b) Deletion, destruction, and anonymization techniques for personal data**

### **• Deletion and Destruction Techniques for Personal Data**

Akcoat's deletion and destruction techniques, procedures, and principles for personal data are listed below:

- **Physical Destruction:** Personal data can also be processed by non-automatic means, if it is part of any data recording system. While such data is deleted/destroyed, a system of physical destruction of personal data- in such a way that it cannot be used later - is applied.
- **Secure Deletion from Software:** While data processed completely or partially automatically and stored in digital media is deleted/destroyed; Methods that ensure to delete the data from the relevant software so that it cannot be recovered again, are used.
- **Secure Deletion by an Expert:** In some cases, it can agree with an expert to delete personal data on its behalf. In this case, personal data is securely deleted/destroyed by an expert in this field so that it cannot be recovered again.
- **Blackout:** Making personal data physically unreadable.

During the situations listed above occur, Akcoat fully complies with PDPL, secondary legislation and other relevant legislation to ensure data security and takes all necessary administrative and technical measures.

- **Techniques for Anonymizing Personal Data**

Anonymization of personal data means making personal data impossible to associate with an identified or identifiable real person in any way, even by matching it with other data. Our company can anonymize personal data when the reasons that require the processing of personal data in accordance with the law disappear.

In accordance with Article 28 of PDPL; Anonymized personal data may be processed for purposes such as research, planning, and statistics. Such processing is outside the scope of PDPL and the express consent of the Relevant Person will not be required for this personal data.

The anonymization techniques most used by our company are listed below:

- **Masking**

It is making it impossible to identify the person by deleting or asterisking certain areas of personal data.

For Example, it is masking to asterisks a part of the phone number of the Relevant Person.

- **Aggregation**

It refers to reflecting the total values by making the data cumulative.

For Example, expressing that the number of female employees in the company is 40% and the number of male employees is 60%.

- **Data Derivation**

It is the replacement of existing detailed data with more general equivalents.

For Example, Anonymization is made by deriving data If the person's direct age is written instead of the day/month/year details of the date of birth.

- **Data Mixing**

It refers to eliminating the detectability of individuals by mixing values within the data set without harming the total benefit.

For Example, in a workplace in which it is desired to average age, data mixing is made when the values showing the ages of the employees are replaced with each other.

## **17. RIGHTS OF RELEVANT PERSONS**

Our Company informs the Relevant Person of his/her rights in accordance with Article 10 of the PDPL, guides the Relevant Person on how to use these rights, and our Company carries out the necessary channels, internal functioning, administrative and technical regulations in accordance with article 13 of the PDPL in order to evaluate the rights of the Relevant Persons and provide the necessary information to the Relevant Persons.

### **a) Rights of Relevant Persons**

Relevant Persons have the following rights:

- Learning whether your personal data has been being processed or not,
- Requesting information about it if it is be processed,
- Learning the purpose of processing your personal data and whether they are used for their intended purpose,
- Knowing the third parties to whom personal data is transferred in the country or abroad,
- Requesting correction of personal data in case of incomplete or incorrect processing and requesting that the action taken within this context be notified to third parties to whom personal data has been transferred,
- Requesting the deletion or destruction of personal data in case the reasons requiring processing no longer exist, even though it has been processed in accordance with the provisions of PDPL and other relevant laws, and requesting that the transaction carried out within this context be notified to third parties to whom personal data has been transferred,
- Objecting to the emergence of a result against him/her because of analyzing his/her processed personal data exclusively with automatic systems,
- Requesting compensation for the damage in case he/she suffers damage due to the processing of personal data unlawfully,

**b) Situations in which the Relevant Person Cannot Assert His/Her Rights**

Relevant Persons cannot assert their rights listed in Article 11 of PDPL in following situations since these matters are excluded from the scope of PDPL in accordance with Article 28 of PDPL,

- Processing of personal data for purposes such as research, planning and statistics through anonymizing them with official statistics.
- Processing of personal data for artistic, historical, literary, or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, public order, economic security, the privacy of private life or personal rights or constitute a crime.
- Processing of personal data within the scope of preventive, protective, and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order, or economic security.
- Processing of personal data by judicial authorities or enforcement authorities regarding investigation, prosecution, trial, or enforcement proceedings.
- Relevant Persons cannot assert their other rights listed in Article 11 of the PDPL, except for the right to demand compensation for damage in the cases listed below in accordance with Article 28/2 of PDPL,
- Processing personal data is necessary for the prevention of crime or criminal investigation.
- Processing of personal data made public by the Relevant Person himself/herself.
- Processing of personal data is necessary for the execution of auditing or regulatory duties and disciplinary investigation or prosecution by official and authorized public institutions and organizations and professional organizations that have the nature of public institutions, based on the authority vested by the law.
- Personal data processing is necessary to protect the economic and financial interests of the State regarding budget, tax, and financial matters.

**c) Relevant Person's Exercise of His/her Rights**

Relevant Persons will be able to submit their requests regarding their rights in Article 11 of the PDPL to our Company free of charge by using the following method:



- 1) Filling in the form at the address [www.akcoat.com](http://www.akcoat.com), sign it with a wet signature, and submit it in person to Akcoat İleri Kimyasal Kaplama Malzemeleri Sanayi ve Ticaret A.Ş, at the address of Kargalı Hanbaba OSB Mah. 1. Sok. No: 18 Hendek/Sakarya.
- 2) Filling in the form at the address [www.akcoat.com](http://www.akcoat.com), sign it with a wet signature, and submit it to Akcoat İleri Kimyasal Kaplama Malzemeleri Sanayi ve Ticaret A.Ş, at the address of Kargalı Hanbaba OSB Mah. 1. Sok. No:18 Hendek/Sakarya through Notary Public.
- 3) Filling in the form at the address [www.akcoat.com](http://www.akcoat.com) and sign it with your “secure electronic signature” within the scope of the Electronic Signature Law No.5070 and submitting it to the address [akcoat@hs01.kep.tr](mailto:akcoat@hs01.kep.tr) through the registered mail address.

Third parties can't exercise their right to receive information stipulated in Article 11 of the PDPL on behalf of Relevant Persons. It is required to submit the signed and notarized original of the special power of attorney issued by the Relevant Person in the name of the person, who will make the application, for the Relevant Person to be able to make a request regarding personal data regarding a person other than himself/herself.

If the transaction requested by the Relevant Persons requires an additional cost, our Company will receive the fee in the tariff determined by the PDP Board. The method of payment of this fee will be specified in the Application Form. If this fee is not paid following the described procedure, applications will not be taken into consideration.

#### **d) Relevant Persons' Right to Complain to the PDP Board**

In cases where the application is rejected in accordance with Article 14 of the PDPL, the response is found to be insufficient, or the application is not responded to in due time; the Relevant Persons can make a complaint to the PDP Board within thirty days from the date of learning our company's response and in any case within sixty days from the date of application.

### **18. AKCOAT'S RESPONSE TO APPLICATIONS**

In case the Relevant Persons submit their request to our Company, our Company will finalize the request as soon as possible and within thirty days at the latest, depending on the nature of the request.

Our company may request information/documents from the Relevant Person to determine whether the applicant is the Relevant Person. Our Company may ask questions of the Relevant Person regarding his/her application to clarify the issues included in the Relevant Person's application.

In the following cases, the applicant's application may be rejected by explaining the reason:

- Processing of personal data for purposes such as research, planning, and statistics through anonymizing them with official statistics.
- Processing of personal data for artistic, historical, literary, or scientific purposes or within the scope of freedom of expression, if it does not violate national defense, national security, public security, public order, economic security, the privacy of private life or personal rights or constitute a crime.
- Processing of personal data within the scope of preventive, protective, and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order, or economic security.
- Processing of personal data by judicial authorities or enforcement authorities regarding investigation, prosecution, trial, or enforcement proceedings.
- Processing personal data is necessary for the prevention of crime or criminal investigation.
- Processing of personal data made public by the Relevant Person himself/herself.
- Processing of personal data is necessary for the execution of auditing or regulatory duties and disciplinary investigation or prosecution by official and authorized public institutions and organizations and professional organizations that have the nature of public institutions, based on the authority vested by the law.
- Personal data processing is necessary to protect the economic and financial interests of the State regarding budget, tax, and financial matters.
- The Relevant Person's request is likely to hinder the rights and freedoms of other persons.
- Relevant Person had requests that required disproportional efforts.
- The requested information is open to the public.

## **19. RELATIONSHIP OF THE POLICY WITH OTHER COMPANY DOCUMENTS**

The Policy is the basic regulation regarding the processing of personal data related to our Company. The Policy has been prepared to be implemented in harmony with other policies, procedures, and processes established by our Company for similar purposes. In case of any conflict between other policies or procedure texts prepared by our company for similar purposes, the provisions of the Policy will be considered in matters related to the processing of personal data.

### **Data Controller:**

Akcoat İleri Kimyasal Kaplama Malzemeleri Sanayi ve Ticaret A.Ş. Kargalı Hanbaba OSB Mah.,  
1. Sok. No: 18 Hendek/Sakarya  
Tel: 0 264 323 30 31  
Fax: 0 264 323 30 32  
Sakarya Trade Registry Office/ Registration No: 5804 [www.akcoat.com](http://www.akcoat.com)

**ANNEX - 1 ABBREVIATIONS**

<b>ABBREVIATIONS</b>	
<b>Clarification Communiqué</b>	Communiqué on the Procedures and Principles to be Complied with to Fulfil the Clarification Obligation, published in the Official Gazette No.30356 dated 10 March 2018
<b>Constitution</b>	Constitution of the Republic of Turkey No. 2709, dated 7 November 1982, published in the Official Gazette No. 17863 dated 9 November 1982
<b>Relevant Person/ Relevant Persons</b>	Akcoat's and/or Akcoat's affiliates/subsidiaries' customers, employees with whom it has commercial relations, customers, business partners, shareholders, officials, candidate employees, interns, visitors, suppliers, employees of the institutions with which it cooperates, third parties and other persons, including but not limited to those listed here. It refers to the real person whose personal data is processed.
<b>Regulation on Deletion, Destruction or Anonymization of Personal Data</b>	Regulation on Deletion, Destruction or Anonymization of Personal Data that was published in the Official Gazette No.30224 dated 28 October 2017 and came into force as of the date of 1 January 2018.
<b>PDPL</b>	Personal Data Protection Law that came into force after being published in the Official Gazette No 29677 dated 7 April 2016.
<b>PDP Board</b>	Personal Data Protection Board
<b>PDP Agency</b>	Personal Data Protection Agency
<b>Art.</b>	Article
<b>e.g.</b>	For Example
<b>Policy</b>	Hereby Personal Data Protection and Privacy Policy Akcoat İleri Kimyasal Kaplama Malzemeleri Sanayi ve Ticaret A.Ş.
<b>Company/Akcoat</b>	Akcoat İleri Kimyasal Kaplama Malzemeleri Sanayi ve Ticaret A.Ş.
<b>Turkish Criminal Law</b>	Turkish Criminal Law No. 5237 dated 26 September 2004 published in the Official Gazette with No.25611 dated 12 October 2004

*(Date of Enactment: 29 September 2020)*