

KEMISAN Klor-ALKALI A.Ş. GENERAL DATA PROTECTION AND PROCESSING REGULATION

Introduction

This General Data Protection and Processing Regulation ("Policy") is based on Kemisan Klor-ALKALI A.Ş. ("Kemisan" or "Company") to inform about the processes and principles of collection, use, sharing, storage, processing, deletion, destruction or anonymization. This Policy includes the principles regarding the processing, deletion, destruction or anonymization of personal data belonging to data owners by Kemisan, and these explanations include Kemisan employees, active and potential customers, suppliers, business partners, visitors and other persons in relationship with Kemisan. It covers all natural persons.

1. GENERAL PRINCIPLES ON THE PROCESSING OF PERSONAL DATA

- ***Processing in accordance with the law and the rule of honesty:*** The relevant data are processed within the framework of universal rights and freedoms and in accordance with the general honesty rule to the extent required by business activities
- ***Ensuring that personal data is accurate and up-to-date:*** Kemisan is responsible for the correct and up-to-date personal data. It takes measures to ensure data accuracy and keeping it up-to-date.
- ***Processing for specific, explicit and legitimate purposes:*** Kemisan processes personal data only to the extent required by our business activities for legitimate purposes.
- ***Being connected, limited and measured for the purpose of processing:*** Kemisan processes personal data within the framework of the specified business activities and avoids the processing of unneeded personal data.
- ***Being kept for the period stipulated in the relevant legislation or required for the purpose for which they are processed:*** Kemisan preserves personal data for the time required for the purpose for which they are processed and the minimum period stipulated in the relevant legislation. In this context, Kemisan first determines whether a period is stipulated for the storage of personal data in the relevant legislation, and if a period is specified, it acts in accordance with this period. If there is no legal period, personal data are stored for the time required for the purpose for which they are processed. Personal data are destroyed at the end of the specified storage periods in accordance with the periodic destruction periods or the data owner application and by the determined destruction methods (deletion and / or destruction and / or anonymization).

2. CONDITIONS OF PROCESSING PERSONAL DATA

Apart from the explicit consent of the personal data owner, the basis of the personal data processing activity can be only one of the following conditions, or more than one condition can be the basis of the same personal data processing activity. If the processed data is personal data of special nature, the conditions set out in the "Processing of Special Qualified Personal Data" of this Policy will be applied.

- Having the explicit consent of the personal data owner
- It is clearly stipulated in the laws

- Failure to obtain the express consent of the person concerned due to the actual impossibility
- Being directly related to the establishment or execution of the contract
- The company's fulfillment of its legal obligation
- Making the personal data public by the personal data owner
- Data processing is mandatory for the establishment or protection of a right
- Data processing is mandatory for the legitimate interest of our company

Processing Special Quality Personal Data

Special Quality Personal Data are processed depending on the following conditions. Personal data, other than health and sexual life, can be processed without the explicit consent of the data owner, if there is an explicit provision in the law. Otherwise, the explicit consent of the data owner will be obtained.

Special quality personal data related to health and sexual life, for the purpose of protecting public health, conducting preventive medicine, medical diagnosis, treatment and care services, planning and managing health services and financing, without seeking express consent by persons under the obligation of secrecy or authorized institutions and organizations. can be processed. Otherwise, the explicit consent of the data owner will be obtained.

3. PURPOSE OF PROCESSING PERSONAL DATA

Personal data obtained by Kemisan can be processed within the scopes explained below:

- Strategic planning and business partners / supplier management
- Process and operations that about the customer
- Company internal operations
- Activities with legal, technical and administrative consequences
- HR operations
- Marketing operations
- Conducting of emergency management processes
- Conducting of information security processes
- Conducting employee candidate / intern / student selection and placement processes
- Conducting the application processes of employee candidates
- Conducting of employee satisfaction and loyalty processes
- Fulfillment of obligations arising from employment contracts and legislation for employees
- Conducting fringe benefits processes for employees
- Conducting audit / ethical activities
- Conducting training activities
- Conducting of access authorizations
- Carrying out activities in accordance with the legislation
- Managing finance and accounting affairs
- Conducting loyalty processes to company / products / services
- Ensuring physical space security
- Managing of assignment processes
- Follow-up and managing of legal affairs
- Conducting internal audit / investigation / intelligence activities
- Conducting communication activities
- Planning human resources processes

- Managing / supervision of business activities
- Carrying out occupational health / safety activities
- Receiving and evaluating suggestions for the improvement of business processes
- Carrying out activities to ensure business continuity
- Carrying out logistics activities
- Carrying out the procurement processes of goods / services
- Carrying out after-sales support services for goods / services
- Carrying out goods / service sales processes
- Carrying out the production and operation processes of goods / services
- Carrying out customer relationship management processes
- Conducting activities for customer satisfaction
- Organization and event management
- Conducting marketing analysis studies
- Conducting performance evaluation processes
- Conducting advertisement / campaign / promotion processes
- Carrying out risk management processes
- Management of archive activities
- Conducting social responsibility and civil society activities
- Management of contract processes
- Conducting sponsorship activities
- Carrying out strategic planning activities
- Follow up of requests / complaints
- Ensuring the security of movable property and resources
- Carrying out supply chain management processes
- Management of wage policy
- Carrying out marketing processes of products / services
- Ensuring the security of data controller operations
- Foreign personnel work and residence permit procedures
- Management of investment processes
- Conducting talent / career development activities
- Informing authorized persons, institutions and organizations
- Carrying out management activities
- Creating and tracking visitor records

4. PERSONAL DATA SUBJECT TO THE PROCESSING ACTIVITY

In line with the principles and conditions stated above, the following personal data, *which belong to the candidates, company employees, interns, shareholders, partners, potential and active customers, employees and officials of our suppliers we work with, and our visitors*, are obtained, processed and transferred to third parties within the scope of the permissions of the relevant persons and only the permission given.

- Identity (such as name surname, mother-father's name, mother's maiden name, date of birth, place of birth, marital status, identity card serial order number, TC identification number)
- Contact (such as address number, e-mail address, contact address, registered e-mail address, telephone number)
- Location (location information of the place of residence)

- Personnel information (such as payroll information, disciplinary investigation, entry-exit document records, asset declaration information, resume information, performance evaluation reports)
- Legal action (information in correspondence with judicial authorities, information in the case file)
- Customer Transactions (such as call center records, invoice, promissory note, check information, information on the counter, order information, request information)
- Physical Space Security (entrance and exit registration information of employees and visitors, camera records, etc.)
- Transaction Security (such as IP address information, website login and exit information, password information)
- Risk Management (such as information processed to manage commercial, technical, administrative risks)
- Finance (such as balance sheet information, financial performance information, credit and risk information, assets information)
- Professional Experience (such as diploma information, courses attended, in-service training information, certificates, transcript information)
- Marketing (shopping history information, survey, cookie records, information obtained through campaign work)
- Visual and Audio Recordings (such as visual and audio recordings)
- Race and Ethnicity (such as information on race and ethnicity)
- Political Thought Information (such as political opinion, political party membership information)
- Philosophical Belief, Religion, Sect and Other Beliefs (information about religious affiliation, information about philosophical belief, information about sect belonging, information about other beliefs)
- Appearance and dress (information about dress and clothing)
- Association Membership (such as association membership information)
- Foundation Membership (such as foundation membership information)
- Union Membership (such as union membership information)
- Health Information (such as disability information, blood group information, personal health information, device and prosthesis information used)
- Sexual Life (such as information on sexual life)
- Criminal Convictions and Security Measures (information on criminal convictions, information on security measures)
- Biometric Data (palm information, fingerprint information, retina scan information, facial recognition information)
- Genetic Data

5. TRANSFER OF PERSONAL DATA

Our company is able to transfer the personal data and special quality personal data of the personal data owner to third parties (third party companies, group companies, third natural persons) by taking the necessary security measures in line with the legal personal data processing purposes.

Personal data are not transferred to third parties at home and abroad by Kemisan without the express consent of the person concerned. On the other hand, in the following cases, data transfer can be made to third parties without obtaining the explicit consent of the person concerned, which is limited in the Policy.

- It is clearly stipulated in the laws
- It is obligatory for the protection of the life or physical integrity of the person who is unable to disclose his consent due to the actual impossibility or whose consent is not legally valid
- It is necessary to process personal data belonging to the parties of the contract, provided that it is directly related to the establishment or performance of a contract
- It is mandatory for the data controller to fulfill legal obligation
- It has been made public by the data owner himself
- When data processing is mandatory for the establishment, use or protection of a right
- Provided that the fundamental rights and freedoms of the relevant person are not harmed, it is necessary for the legitimate interests of the data controller

In the transfer of special quality personal data, the conditions specified in the terms of the processing of this data are complied with, and the personal data related to health and sexual life, which are among the special quality personal data, are transferred without the express consent of the relevant person in the following cases.

- Protection of public health
- Preventive medicine
- Medical diagnosis
- Carrying out treatment and care services
- Planning and management of health services and financing
- In accordance with the legislation, existing of requests from public, semi-private, private institutions and organizations

Personal data of special nature other than health and sexual life, on the other hand, are transferred to third parties in Turkey, provided that it is stipulated in the law and adequate measures are taken.

In addition to the above, personal data may be transferred to foreign countries that have been declared to have sufficient protection by the Board ("Foreign Country with Adequate Protection") in the presence of any of the above conditions. In the absence of adequate protection, in line with the data transfer conditions stipulated in the legislation, it can be transferred to foreign countries ("Foreign Country of Adequate Protection") where data controllers in Turkey and the relevant foreign country have undertaken an adequate protection in writing and have the permission of the Board.

6. STORAGE AND DISPOSAL OF PERSONAL

Our Company keeps personal data for the time required for the purpose for which they are processed and for the minimum period stipulated in the relevant legal legislation. In this context, our Company first determines whether a period is stipulated for the storage of personal data in the relevant legislation, and if a period is specified, it acts in accordance with this period. If there is no legal period, personal data are stored for the period required for the purpose for which they are processed. Personal data are destroyed at the end of the specified storage periods in accordance with the periodic destruction periods or the data owner application and by the determined destruction methods (deletion and / or destruction and / or anonymization).

7. ENLIGHTENMENT OF THE PERSONAL DATA OWNER

Our company, in accordance with Article 10 of the GDPR and secondary legislation, informs personal data owners about who, as the data controller, for what purposes, with whom it is shared, with what methods, the legal reason and the rights of data owners within the scope of processing their personal data.

8. RIGHTS OF PERSONAL DATA OWNERS

Personal data owners have the following rights:

- Learning whether own personal data is processed or not
- Requesting information if personal data has been processed
- Learning the purpose of processing personal data and whether they are used appropriately for their purpose
- To know the third parties in the country or abroad to whom personal data has been transferred
- To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data are transferred
- Although it has been processed in accordance with the provisions of the law and other relevant laws, to request the deletion or destruction of personal data in the event that the reasons for its processing disappear, and to request notification of the transaction made within this scope to third parties to whom personal data has been transferred
- To object to the emergence of a result against the person by analyzing the processed data exclusively through automated systems
- To request the compensation of the damage in case of damage due to unlawful processing of personal data

In case of violation of their rights mentioned above, data owners can apply to us by one of the following methods by using a wet signed copy of the Relevant Person Application Form at www.kemisan.com.

- Application in person (Applicant must come in person and apply with a document certifying own identity)
- Notification by means of a notary
- Secure electronic signature or mobile signature

Kemisan Klor-Alkali A.Ş.