

Personal Data Protection and Privacy Policy

Confidentiality Agreement for Website

How information we obtained about you and services you require will be used and protected when you visit this website and use services we offer through this website shall be subject to conditions specified in this "Privacy Policy". You agree to comply with the conditions specified in this "Privacy Policy" when you visit this website and request for using services we offer through this site.

I. Objective of protecting and processing personal data

As Çetin Civata Anonim Şirketi, all data we received from customers or potential customers have been kept confidential and never disclosed to any third person due to sensitivity of the business we deal with. Protection of personal data is the basic policy of our company. Before enactment of legal regulations, our companies and subsidiaries attached great importance to confidentiality of personal data and adopted this as a working principle and gave their employees instructions to work in line with this principle. As Çetin Civata Anonim Şirketi, we undertake to comply with all responsibilities under the Personal Data Protection Law. The principles of our company regarding the protection of personal data also apply to subsidiaries.

II. Scope and amendment of personal data protection and processing policy

This Policy has been prepared by our Company in accordance with the Law No. 6698 on Protection of Personal Data ("KVKK"). The law has come into force with all its provisions as of today. The data obtained from you in accordance with your consent or in accordance with other laws will be used for the purpose of improving the services we provide and improving our services and quality policy. Further, we remove certain data from the category of personal data and anonymize them. These data are data used for statistical purposes and the Law and Policy do not apply to them. Çetin Civata Anonim Şirketi Personal Data Protection and Processing Policy aims to protect data automatically collected from our customers, potential customers, employees, customers or employees of customers working as solution partner with us or other persons and contains the relevant provisions. Our Company has right to amend our policy and Regulation subject to the condition of complying with the law and for better protection of the personal data.

III. Basic rules on processing of personal data

a) Compliance with the law and principles of good faith: Çetin Civata Anonim Şirketi questions the source of the data it collects or received from other companies and attaches importance to obtaining them within the framework of compliance with the law and principle of good faith. Accordingly, Çetin Civata Anonim Şirketi makes necessary warnings and notifications to third parties (agencies and other intermediary institutions) that sell the services provided by the Company to protect personal data.

b) Accuracy and revision when necessary: Çetin Civata Anonim Şirketi pays

attention to the fact that all the data within the organization is correct, does not contain false information, and a revision if made in case of any change in the personal data.

c) Processing for specific, clear and legitimate purposes: Çetin Civata Anonim Şirketi only processes data limited to the purposes for which consent was received from people during service. It does not process, use and make use of data other than for business purposes.

d) Being connected, limited and proportional with the purpose for which they are processed: Çetin Civata Anonim Şirketi uses the data only for the purpose for which it is processed and to the extent required by the service.

e) Storage for the period required by applicable legislation or for the purpose for which they are processed: Çetin Civata Anonim Şirketi maintains the data originating from contracts for the duration of disputes and in accordance with the requirements of commercial and tax laws. However, data is deleted or anonymized in case these objectives do not apply any longer.

It is important to note that these principles above apply regardless of whether Çetin Civata Anonim Şirketi has collected or processed the data in accordance with the consent or in accordance with the law.

You have the rights listed below in accordance with Article 11 of the Personal Data Protection Law. Çetin Civata Anonim Şirketi prepared an application form for you in order to facilitate these rights.

Persons whose personal data is processed have right to submit an application to the contact person announced in our website by Çetin Civata Anonim Şirketi, and to:

- a) request information as to whether personal information is processed or not;
- b) get information on objectives of processing and as to whether it is processed in accordance with the objectives;
- ç) get information on local or foreign persons who were transferred personal information;
- d) request for correction if it is incomplete or inaccurate;
- e) demand deletion or destruction personal information in accordance with article 7;
- f) demand notification of the processes performed in accordance with paragraphs (d) and (e) to third persons who are transferred personal data;
- g) file an objection against any adverse consequence that may arise from processing of information exclusively through automatic systems;
- ğ) claim compensation of damages in case any loss or damage arises due to processing in breach of the law. As Çetin Civata Anonim Şirketi we respect these rights.

According to our company principle, the data received by Çetin Civata Anonim

Şirketi are processed in the system only to the extent it is necessary. Therefore, type of data we collect is determined by the purpose. Data that are not required are not collected. Other data transferred to our company are also transferred to the company information systems. Excess information is not saved to the system, it is deleted or anonymized.

Deletion of personal data

Personal data are deleted, destroyed or anonymized by our company either at the request of the person concerned, or when the legal requirements expire, it is no longer required for legal procedures or other conditions.

As a rule, the data held by Çetin Civata Anonim Şirketi are processed as declared by the relevant persons. Çetin Civata Anonim Şirketi does not have to investigate the accuracy of the data declared by the customers or the persons contacting Çetin Civata Anonim Şirketi, nor is it done because of our legal and business principles. The declared data is considered correct. The principle of accuracy and timeliness of personal data has also been adopted by Çetin Civata Anonim Şirketi. Personal data processed by our Company based on official documents received or upon request of the concerned person are revised. Necessary measures are taken for this purpose.

Privacy and data security

Personal data are confidential and Çetin Civata Anonim Şirketi respects this confidentiality. Only authorized persons in the company can access personal data. All necessary technical and administrative measures are taken to protect the personal data collected by Çetin Civata Anonim Şirketi and prevent access by unauthorized people and to our customers and prospects from suffering losses. For this purpose, it is ensured that software is in compliance with the standards, third parties are selected carefully and data protection policy is implemented in the company.

IV. Objectives of data processing

Collection and processing of personal data by Çetin Civata Anonim Şirketi shall be performed in accordance with the objectives specified in the information notice. Data is collected and processed for entering into agreements and providing better services to customers.

V. Data of customers, prospective customers, business and solution partners

Collection and processing of data for the contractual relationship

If a contractual relationship has been established with our customers and prospects, the personal data collected can be used without the customer's consent. However, this use takes place for the purpose of the contract. Data is used in accordance with the better execution of the contract and the requirements of the service and it is updated by contacting the customers when necessary. In contrast, the data left by our prospects (prospective customers) by us is processed to provide

them with easier and higher quality service. These data are deleted if they do not turn into a contractual relationship upon their request.

Data of Business and Solution Partners

Çetin Civata Anonim Şirketi adopts the principle of acting in compliance with the law during business and disclosure of data to solution partners. Data is shared with the business and solution partners subject to the commitment of data confidentiality and only as much as the service requires and these parties are forced to take measures to ensure data security from these parties.

Data Processing for Advertisements

Electronic message for advertisement purposes may be sent to persons subject to prior consent obtained in accordance with the Law on Regulation of E-Trade and Regulation on Commercial Electronic Messages. It is mandatory to obtain express consent of the recipient of the advertisement. Çetin Civata Anonim Şirketi complies with the details of "consent" as specified in the same legislation.

Data operations performed due to the company's legal obligation or as clearly prescribed by the law

Personal data may be processed without prior approval, in order to clearly state the processing in the relevant legislation or fulfil a legal obligation determined by the legislation. The type and scope of data processing must be necessary for the legally permitted data processing activity and comply with the relevant legal provisions.

Data processing of the company

Personal data can be processed in line with the company's services and legitimate purposes. However, the data cannot be used in any way for illegal services.

Processing special categories of data

Special categories of data consist of data in connection with the race, ethnic origin, political affinity, philosophical view, religion, sect or other beliefs, clothing style, membership to any association, foundation or union, health, sexual preferences, criminal history and security measures as well as biometric and genetic data. Çetin Civata Anonim Şirketi also takes adequate measures determined by the Board in the processing of special personal data.

Çetin Civata Anonim Şirketi may only process special quality data for the purpose for which it was collected, with the consent of individuals, in order to provide better services.

Data obtained through membership transactions

If you become a member of Çetin Civata Anonim Şirketi, your personal data that you share with us for the membership process is processed in our systems. If you

become a member of our system via Facebook, Google or other social media; Your information, such as your name, surname, profile picture and e-mail address, is provided to the partners of the relevant social media tool and this information is transferred to the systems of Çetin Civata Anonim Şirketi.

Data processed by automated systems

Çetin Civata Anonim Şirketi acts in accordance with the Law regarding the data processed through automatic systems. The information obtained from these data cannot be used against the person without the express consent of the persons. However, Çetin Civata Anonim Şirketi can make decisions about persons party to certain business deals by using the data in its system.

Your Rights About Personal Data

As Data Subject, you can submit an application to Çetin Civata Anonim Şirketi and:

Get information as to whether your personal information is processed or not;

Get information if your personal information is processed;

Get information on the purpose of processing your personal information and as to whether it was used in accordance with the purpose;

Get information on local and foreign third parties who were transferred your personal information;

Request correction in case your personal data are processed in an incomplete or inaccurate manner and request notification of such corrections to the third persons who received personal data;

Request deletion or destruction of personal data in case reasons requiring processing thereof become invalid following the processing of the data in accordance with Privacy Law No. 6698 and provisions of other applicable legislation, and require notification of the same to the third persons who received your personal data;

File objection against unfavourable results obtained through analysis of personal data using automatic systems only;

Claim compensation of losses and damages that may arise from illegal processing of personal data.

In case your application in connection with the aforementioned rights is submitted to our company in accordance with the application procedures specified in the [Communique on Procedures and Principles on Applying to Data Controller](#), Çetin Civata Anonim Şirketi shall finalize your request free of charge in the shortest time and latest within 30 (thirty) days. However, in case Çetin Civata Anonim Şirketi incurs any costs for the

solution of your request, we will charge the fee specified in tariff of the Personal Data Protection Board.

Functionality and Analytic

Cookies contain data on remembering your preferences, using the website effectively, optimizing the site to respond to user requests, and how visitors use the site. By nature, this type of cookie contains usernames etc. may include your personal information.

Third Party Cookies

Çetin Civata Anonim Şirketi websites / mobile applications / mobile websites work with third-party trusted, well-known advertisement providers. Third party service providers place their own cookies in order to provide you customized advertising. Cookies placed by a third party collect, process and analyse visitors' browsing information on websites.

Commercial cookies

It serves to increase your usage experience by offering the ones that are similar to the product / content you target in line with your interests and choices and by offering a more developed, personalized advertisement portfolio. The duration of the session, persistent, functional and analytical and commercial cookies mentioned above is about 2 (two) months and necessary adjustments can be made in the personal internet browser settings. Removal from these settings may vary based on the internet browser.

How can I delete cookies?

Many internet browsers are set to automatically accept and use cookies from the first installation on your computer. By using the help or settings menus of your internet browser, you can ensure that cookies are blocked or that a warning is sent when a cookie is sent to your device. You can take advantage of your browser's instructions or help options screen to learn about different ways to manage cookies and how to adjust the settings of the browser you use.

VI. Data of employees

Processing of data for employment relationship

Personal data of employees may be processed without consent to the extent it is required for employment relationship and health insurance. However, Çetin Civata Anonim Şirketi ensures the privacy and protection of its employees' data.

Processing Due to Legal Liabilities

Çetin Civata Anonim Şirketi may process personal data without prior approval, in

order to clearly state the processing in the relevant legislation or fulfil a legal obligation determined by the legislation. This processing is limited with obligations arising from the law.

Processing for the Benefit of Employees

Çetin Civata Anonim Şirketi may process personal data without consent for the benefit of employees such as private health insurance. Çetin Civata Anonim Şirketi may process data of employees in disputes arising from employment relationship.

Processing special categories of data

Special categories of data consist of data in connection with the race, ethnic origin, political affinity, philosophical view, religion, sect or other beliefs, clothing style, membership to any association, foundation or union, health, sexual preferences, criminal history and security measures as well as biometric and genetic data. Çetin Civata Anonim Şirketi also takes adequate measures determined by the Board in the processing of special personal data in addition to consent of the concerned person. Special categories of data can only be processed without limitation of the person, regarding the cases permitted and limited by the Law: In order for our employees to benefit from insurance and health services, qualified data taken from them is used only for the purpose.

Data processed by automated systems

The data processed about the automated systems in relation to the employees can be used in internal promotions and performance evaluations. Our employees have the right to object to the outcome against them and they do so by following internal procedures. The objections of the employees are also evaluated within the company.

Telecommunications and internet

Computer, phone, e-mail and other applications allocated to employees within the company are allocated to the employee for business purposes only. The employee cannot use any of these tools that the company has allocated to it for their special purposes and communication. The company can control and control all data on these devices. The employee undertakes that he/she will not have any other data or information on the computer, telephones or other tools allocated to him/her from the moment he/she starts working.

VII. Transfer of personal data at home and abroad

Çetin Civata Anonim Şirketi may transfer personal data to its business and solution

partners and affiliates of Çetin Civata Anonim Şirketi.

Çetin Civata Anonim Şirketi may transfer the personal data to the individuals and institutions listed below for certain purposes;

»To the business partners of Çetin Civata Anonim Şirketi solely to ensure the fulfilment of the business partnership aims,

»To the suppliers of Çetin Civata Anonim Şirketi limited to provide our company with outsourced services and necessary services to carry out the commercial activities of our Company,

»Solution partners of Çetin Civata Anonim Şirketi limited to ensuring the execution of the commercial activities that require the participation of the affiliates of our company,

»To the affiliates of Çetin Civata Anonim Şirketi.

Çetin Civata Anonim Şirketi has the authority to transfer personal data in accordance with the conditions set by the Board in the country and abroad in accordance with other conditions in the Law and upon consent of the person.

VIII. Rights of the concerned person

Çetin Civata Anonim Şirketi acknowledges that the relevant person has the right to get approval before the data is processed, and after the data is processed, he has the right to determine the fate of his data.

In connection with personal data, you have right to submit an application to the contact person announced in our website by Çetin Civata Anonim Şirketi, and to:

- a) request information as to whether personal information is processed or not;
- b) get information on objectives of processing and as to whether it is processed in accordance with the objectives;
- ç) get information on local or foreign persons who were transferred personal information;
- d) request for correction if it is incomplete or inaccurate;
- e) demand deletion or destruction personal information in accordance with article 7;
- f) demand notification of the processes performed in accordance with paragraphs (d) and (e) to third persons who are transferred personal data;
- g) file an objection against any adverse consequence that may arise from processing of information exclusively through automatic systems;
- ğ) claim compensation of damages in case any loss or damage arises due to processing in breach of the law.

However, individuals do not have a right to anonymized data within the Company. Çetin Civata Anonim Şirketi may share personal data by relevant institutions and organizations in order to exercise the legal powers of a jurisdiction or state authority in accordance with its business and contract relationship.

For applications on rights listed above, data subjects may complete the form at www.cetin.com.tr sign the form and send Muratbey Merkez mahallesi, Fabrikalar Cad. No:17 Çatalca / İstanbul address by registered mail and together with copy of their identification cards (only with copy of the front face of the identification card). Your applications will be responded as soon as possible according to the content of your application or within 30 days after receipt by the company. You must make your applications by registered mail. In addition, only the part of your applications will be answered, and an application about your spouse, relative or friend will not be accepted. Çetin Civata Anonim Şirketi may request additional information and documents from applicants.

IX. Confidentiality Principles Çetin Civata Anonim Şirketi keeps data of employees and other persons confidential. No person is permitted to use, duplicate, copy data or transfer them to others or use them beyond business purposes without compliance with the agreement or the law.

X. Process Security

All necessary technical and administrative measures are taken to protect the personal data collected by Çetin Civata Anonim Şirketi and prevent access by unauthorized people and to our customers and prospects from suffering losses. For this purpose, it is ensured that software is in compliance with the standards, third parties are selected carefully and data protection policy is implemented in the company. Measures on security are revised and improved regularly.

XI Audit

Çetin Civata Anonim Şirketi procures internal and external audits as required for protection of personal data.

XII. Notification of Violations

Çetin Civata Anonim Şirketi immediately takes action to remedy the violation when it is notified of any violation related to personal data. It minimizes damages to the concerned and compensates the loss. When the personal data is intercepted by unauthorized persons, it immediately informs the Personal Data Protection Board.

For notification of violations, application may be filed in accordance with procedures at <http://cetin.com.tr>.

Communication

For your inquiries and questions about confidentiality agreement, please print and complete the form below and send to the address provided below by registered mail.

Çetin Civata Anonim Şirketi

Mersis No : 0245000668300015

Kep address : cetinsanayi@hs02.kep.tr

Address : Muratbey Merkez Mah.Fabrikalar Cad.No:17 Çatalca İstanbul

Electronic Notification address : 25999-45761-33939