

## TEXT ON THE PROTECTION AND PROCESSING OF PERSONAL DATA REGARDING THE PERSONAL DATA PROTECTION LAW

### Introduction, Purpose, and Scope

This Personal Data Protection and Processing Text of HASEN® FLAGPOLES ELECTRIC AND ELECTRONIC INDUSTRY AND TRADE LTD. CO., prepared in accordance with Law No. 6698 on the Protection of Personal Data, sets out the procedures and principles determined by our Company to ensure compliance with the Law. Our Company has adopted the principles and rules established under the Law regarding the protection and processing of personal data.

This text regulates matters related to the processing of data of job applicants, customers, business partners, suppliers, and third parties whose data are processed by our Company.

### Enforcement and Amendments

This text has come into force within the scope of the Personal Data Protection Law. The Company reserves the right to make amendments to this text and its practices in line with legal regulations.

## DATA SUBJECTS, PURPOSES OF DATA PROCESSING, AND CATEGORIES OF DATA IN PERSONAL DATA PROCESSING ACTIVITIES CARRIED OUT BY OUR COMPANY

### Data Subjects

The data subjects within the scope of this text include all natural persons whose personal data are processed by the Company, including Company employees. In this context, the general categories of data subjects are as follows:

DATA SUBJECT CATEGORY	DESCRIPTION
1. Job Applicant	Natural persons applying for a position at the Company via CV submission or other methods
2. Employee Family Member	Family members of Company employees
3. Shareholder	Natural person shareholder/partner of the Company
4. Customer / Product or Service Recipient	Company customer, natural person customer, customer employee, customer representative
5. Potential Customer / Product or Service Recipient	Companies and their authorized personnel or employees who are potential Company customers, and individual potential customers
6. Supplier Employee / Authorized Person	Employees and authorized representatives of companies from which the Company procures products or services
7. Business Partner Authorized Person	Legal entities with which a commercial relationship is established
8. Third Party	Occupational health and safety experts, auditors, consultants

The categories are as follows:

### **Purposes of Personal Data Processing**

Your personal data and sensitive personal data may be processed by the Company for the purposes set forth in the Law and related legislation, including but not limited to:

- Execution of information security processes
- Recruitment and placement processes of job applicants
- Management of application processes of job applicants
- Ensuring compliance of activities with legislation
- Execution of finance and accounting processes
- Ensuring physical security of Company premises
- Legal affairs management
- Execution of communication activities
- Conducting and auditing business activities
- Receiving and evaluating suggestions for business process improvements
- Ensuring business continuity
- Logistics operations
- Procurement of goods and services
- Sales of goods and services
- Production and operational processes
- Customer relationship management
- Customer satisfaction activities
- Archiving and record-keeping
- Contract management
- Strategic planning activities
- Protection of movable assets and resources
- Supply chain management
- Marketing of products and services
- Ensuring the security of data controller operations
- Provision of information to authorized persons, institutions, and organizations

### **Categories of Personal Data**

The personal data categorized by the Company are processed in accordance with the conditions for processing personal data set forth in the Law and related legislation:

SHORT LABEL	DESCRIPTION
Identity Information	Name and surname, parents' names, mother's maiden name, date and place of birth, marital status, ID serial number, national ID number, license plate, and other identifying information in identity cards, driver's licenses, passports, marriage certificates, bar IDs, etc.
Contact Information	Phone number, address, email, and other information enabling communication with the data subject
Customer Transaction Information	Information obtained or generated about the relevant person in the course of commercial operations
Physical Security	CCTV recordings obtained during entry to and presence within Company premises
Transaction Security Information	Personal data processed to ensure technical, administrative, legal, and commercial security during business activities
Financial Information	Any financial data, documents, or records generated depending on the type of legal relationship with the data subject, including bank account information
Professional Experience Information	Information about past professional experience
Visual-Audio Records	All visual and audio records linked to data subjects among employees
Sensitive Personal Data	Data revealing race, ethnic origin, political opinion, philosophical belief, religion, sect, other beliefs, dress and appearance, association, foundation or union membership, health, sexual life, criminal convictions and security measures, and biometric or genetic data

### **Principles Regarding the Processing of Personal Data**

Your personal data are processed in accordance with the personal data processing principles set forth in Article 4 of the Law. Each data processing activity must comply with these principles:

- **Lawfulness and Fairness:** The Company processes your personal data in compliance with laws, secondary regulations, and general principles of law, limiting processing to its intended purpose and considering the reasonable expectations of data subjects.

- **Accuracy and Up-to-date Data:** The Company ensures personal data are accurate and up to date. Data subjects have the right to request the correction or deletion of inaccurate or outdated data.
- **Processing for Specific, Explicit, and Legitimate Purposes:** Data processing purposes are determined prior to each activity, ensuring they are lawful.
- **Data Minimization:** Processing is limited to personal data necessary for the intended purpose.
- **Retention Limitation:** Personal data are retained only for as long as required by law or for achieving the processing purpose, after which they are deleted, destroyed, or anonymized.

## Conditions for the Processing of Personal Data

Your personal data are processed by the Company provided that at least one of the conditions for processing personal data set forth in Article 5 of the Law exists. Explanations regarding these conditions are as follows:

- **Explicit Consent of the Data Subject:** In cases where no other condition for processing exists, personal data may be processed by the Company only if the data subject gives explicit consent, freely and with full knowledge regarding the personal data processing activity, in a manner leaving no room for doubt, and strictly limited to the specific processing activity, in accordance with the general principles set forth under Section 3.1.
- **Processing Required by Law:** Personal data may be processed by the Company without the data subject's explicit consent if the data processing activity is explicitly required by law. In such cases, the Company shall process personal data in accordance with the relevant legal provisions.
- **Processing Necessary Due to Factual Impossibility:** If it is not possible to obtain the data subject's explicit consent due to factual impossibility, and processing of personal data is mandatory, the Company may process the personal data of a data subject who is unable to express consent or whose consent cannot be legally recognized, provided that the processing is necessary to protect the life or physical integrity of the data subject or of another person.
- **Processing Necessary for the Performance of a Contract:** If a personal data processing activity is directly related to the establishment or performance of a contract, the Company shall process personal data of the parties to the contract, either established or already executed, to the extent necessary for the processing activity.
- **Processing Required to Fulfill a Legal Obligation:** The Company may process personal data if it is mandatory for the data controller to fulfill a legal obligation under the applicable legislation.
- **Public Disclosure by the Data Subject:** Personal data that have been made public by the data subject, i.e., disclosed to the public by any means, may be processed by the Company without the explicit consent of the data subject, solely for the purpose of public disclosure.

- Processing Necessary for the Establishment, Exercise, or Protection of a Right: If the processing of personal data is necessary for the establishment, exercise, or protection of a right, the Company may process the data subject's personal data without obtaining explicit consent.
- Processing Based on Legitimate Interest: Personal data may be processed by the Company for the legitimate interests of the data controller, provided that such processing does not harm the fundamental rights and freedoms of the data subject and the balance of interests between the Company and the data subject is observed. In this context, when processing data based on legitimate interest, the Company first determines the legitimate interest to be achieved through the processing activity, evaluates the potential impact of the processing on the rights and freedoms of the data subject, and only proceeds with the processing if it concludes that the balance is not impaired.

### **Conditions for Processing Sensitive Personal Data**

As per Article 6 of the Law, sensitive personal data include race, ethnic origin, political opinion, philosophical belief, religion, sect, other beliefs, dress and appearance, association or union membership, health, sexual life, criminal convictions and security measures, and biometric and genetic data.

- Sensitive personal data, except for health and sexual life, can be processed with the data subject's explicit consent or as explicitly provided by law.
- Health and sexual life data can be processed without consent only by persons under confidentiality obligations or authorized institutions for public health, preventive medicine, medical diagnosis, treatment, care, and health service planning and management.

### **TRANSFER OF PERSONAL DATA**

The Company may transfer personal data domestically or abroad, provided that the conditions for data transfer are met, in accordance with Articles 8 and 9 of the Law and the additional regulations determined by the Personal Data Protection Authority.

- Domestic Transfer to Third Parties: Personal data may be transferred to third parties within the country by the Company, provided that at least one of the conditions for processing personal data set forth in Articles 5 and 6 of the Law, and explained under Section 3 of this text, exists, and provided that the fundamental principles of data processing are adhered to.
- International Transfer to Third Parties: In cases where the explicit consent of the data subject is not obtained, personal data may be transferred abroad by the Company, provided that at least one of the conditions for processing personal data set forth in Articles 5 and 6 of the Law, and explained under Section 3 of this text, exists, and provided that the fundamental principles of data processing are complied with.
- Transfer to Non-Secure Countries: If the country to which the transfer is to be made is not among the secure countries announced by the Personal Data Protection Authority, the transfer of personal data to third parties abroad may only occur if the Company and the data controller in the relevant country provide a written commitment

to ensure sufficient protection, and the Personal Data Protection Authority grants permission for the transfer, provided that at least one of the data processing conditions set forth in Articles 5 and 6 of the Law exists.

In accordance with the general principles of the Law and the data processing conditions set forth in Articles 8 and 9, the Company may transfer personal data to the parties listed in the table below:

Shared Party	Scope
Authorized Public Institutions and Organizations	Public institutions and organizations legally authorized to request information and documents from the Company
Natural Persons or Private Legal Entities	Individuals or private legal entities, including suppliers, subcontractors, business partners, banks, and service providers
Public	Information that is publicly available

## **NOTIFICATION OF DATA SUBJECTS AND RIGHTS OF DATA SUBJECTS**

Pursuant to Article 10 of the Law, data subjects must be informed about the processing of their personal data prior to or at the latest at the time of the processing. In accordance with this article, the Company, acting as the data controller, has established the necessary internal structure to ensure that data subjects are properly informed in every instance where personal data processing activities are carried out.

**Accordingly, as a data subject, you are entitled to the following rights under Article 11 of the Law:**

- To learn whether your personal data are being processed,
- To request information if your personal data have been processed,
- To learn the purpose of the processing of your personal data and whether these are used in accordance with their purpose,
- To be informed of the third parties to whom your personal data have been transferred domestically or abroad,
- To request the correction of your personal data if they are incomplete or inaccurate, and to request that the actions taken in this regard be communicated to the third parties to whom your personal data have been transferred,
- To request the deletion or destruction of your personal data if the reasons for processing no longer exist, even if they were processed in accordance with the Law and other relevant legislation, and to request that the actions taken in this regard be communicated to the third parties to whom your personal data have been transferred,
- To object to the emergence of a result against you through the analysis of your processed data exclusively by automated systems,
- To request compensation for any damage incurred due to unlawful processing of your personal data.

Applications regarding these rights can be submitted to us via [info@hasenpaslanmaz.com.tr](mailto:info@hasenpaslanmaz.com.tr). Depending on the nature of your request, your application will be processed free of charge within thirty (30) days. However, if the process incurs an additional cost, a fee may be charged in accordance with the tariff determined by the Personal Data Protection Authority.

## **DELETION, DESTRUCTION, OR ANONYMIZATION OF PERSONAL DATA**

Pursuant to Article 7 of the Law, even if personal data have been processed lawfully, when the reasons requiring the processing of personal data no longer exist, the Company shall delete, destroy, or anonymize such data either ex officio or upon the request of the data subject, in accordance with the guidelines published by the Authority.

### **Annex-1: Definitions**

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<b>Personal Data</b>	Any information relating to an identified or identifiable natural person.
<b>Sensitive Personal Data</b>	Data revealing race, ethnic origin, political opinion, philosophical belief, religion, sect, or other beliefs, dress and appearance, association, foundation or union membership, health, sexual life, criminal convictions, security measures, and biometric data.
<b>Data Subject / Relevant Person</b>	Natural person whose personal data are processed.
<b>Processing of Personal Data</b>	Any operation performed on personal data, whether automated or not, including collection, recording, storage, modification, disclosure, transfer, or classification.
<b>Explicit Consent</b>	Freely given, informed, and specific consent for a particular matter.
<b>Data Controller</b>	Natural or legal person who determines the purposes and means of personal data processing.
<b>Data Processor</b>	Natural or legal person processing data on behalf of the data controller.
<b>Personal Data Inventory</b>	Document detailing the Company's personal data processing activities, purposes, categories, recipients, retention periods, international transfers, and security measures.
<b>Personal Health Data</b>	Any health-related information relating to an identified or identifiable natural person.
<b>KVK Law</b>	Law No. 6698 on the Protection of Personal Data dated March 24, 2016.
<b>KVK Board</b>	Personal Data Protection Board.
<b>KVK Institution</b>	Personal Data Protection Authority.

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<b>Text</b>	HASEN® FLAGPOLES ELECTRIC AND ELECTRONIC INDUSTRY AND TRADE LTD. CO. Personal Data Protection and Processing Text.
<b>Company / Data Controller</b>	HASEN® FLAGPOLES ELECTRIC AND ELECTRONIC INDUSTRY AND TRADE LTD. CO.