

**AKM Metalurji Sanayi Temsilcilik ve Dış Ticaret Limited Şirketi**  
**CLARIFICATION TEXT**  
**On the Personal Data Protection Law**

As AKM Metalurji, we show maximum precision on the protection of your data; therefore, the personal data of every person involved with our company, including people who use our services, is processed and preserved in accordance with the Personal Data Protection Law. The purpose of this law is to regulate the responsibilities, procedures, and principles of natural and legal persons who process personal data and to protect fundamental rights and freedoms, especially the privacy of private life.

With comprehension of this responsibility and as a Data Controller, we process your personal information in compliance with the legislation as explained below.

**i) The Gathering of Your Personal Data**

Your personal data may be gathered by means which are automatic or non-automatic by our employees (including our beginner employees), our sales team, our website, our customers or with other similar recourses, verbally, on paper or electronically depending on the services and products provided, or other commercial activities.

**ii) The Processing of Your Personal Data**

As long as you use our products and services; call our company or use our website to use our services, visit our company or our website, participate in the sales activities, sales meetings, seminars, training activities or events that are arranged by our company, your personal data may be processed due to the fulfillment of our legal responsibilities and assurance of our business continuity.

**iii) The Purposes Of Processing Your Personal Data**

Your gathered personal data is processed in accordance with the personal data processing conditions which are mentioned in the 5th and 6th articles of the Personal Data Protection Law with the purposes of our sales team to offer you our products and services, the products and services offered by our company to be recommended to you based on your needs and likings, the data about your purchasing habits to be reported and evaluated, commercial/statistical analyses to be made, to assure the legal and commercial security of persons who are in business relations with our company (sales and marketing activities run by our company and legal, executive, and financial operations on commercial activities, ensurance of the security and supervision of our office, warehouse and other premises, business partners/customers/suppliers/subcontractors, their representatives/staff and their evaluation/inspection procedures, legal procedures, financial affairs etc.), for our company's commercial and sales/production strategies to be determined and executed and the assurance of the conditions related to products/services received by our company's suppliers and subcontractors, employment of workers, and execution of workplace management.

Your personal data may be processed with the purposes and legal reasons listed (although not limited to the ones listed) below.

**We process the personal data gathered by our customers/sellers/suppliers/subcontractors with the purposes listed below:**

- To record information on current accounts,
- To form sales contracts,
- To make listings,
- To make reports,
- To create a database,
- To make verifications,
- To make analyses,
- To make evaluations,
- To track accounting and financial data.

**We process the personal data gathered by our Employees/Employee Candidates with the purposes listed below:**

- To perform employment and insurance (Social Security Institution and Private Health Insurance) processes,
- To make reports,
- To prepare payrolls, perform timekeeping and personnel processes,
- Archiving and registering to computer programs used.

In any case your personal data;

May be processed to provide if demanded as a part of a regular legal process to perform our legal obligations.

Your personal data will be preserved for the maximum time stated in the regarding regulation and the legal statute of limitation in any case.

Which Of Your Personal Data Do We Process?	
<b>Identity Data</b>	Your Name, Surname, TC Identification Number, Date of Birth, Place of Birth, Marital Status, Gender, Nationality,
<b>Communication Data</b>	Your Phone Number, E-Mail address, Address,
<b>Financial Data</b>	Your Bank Account Information, Credit Card Information (including the CVV number),
<b>Work Data</b>	The Company You Work For, Your Department, Way Of Work, Profession, Signature, Business Card/Permit/License Information, Résumé,
<b>Visual and Auditory Data</b>	Photographs of the natural person, Recordings, Vehicle Photographs
<b>Website Usage Data</b> <b>Application Form Filling Date</b>	Application form filling date, Offers you received or weren't able to receive, The date you joined, Times/the frequency of which you logged in, The last date of login
<b>Other</b>	Information on customers our sales employees/representatives visited, the information of customer candidates, The contact info of customers (phone number, work number, e-mail address, etc.)

#### **iv) Whom Your Processed Data May Be Transferred To And Why**

Your gathered personal data may be transferred to our business partners, suppliers, subcontractors, shareholders, legally competent public institutes and private persons for the reasons of our sales and marketing department taking action on markets/products, product production/supply required to offer you the products provided by our company, making recommendations based on customers' purchasing habits, likings, methods of utilization of the products they purchase, habits and requirements, sending commercial e-mails based on customers' permission preferences, sending mail, reporting and evaluating purchasing data, making commercial and statistical evaluations and analyses, the assurance of the legal and commercial protection of the company, the persons, suppliers, subcontractors, employees and employee candidates, who are involved in work relations and contracts with the company (executive operations run by the company about communication, to ensure the physical security and supervision of the company's properties like workplaces and warehouses, assessment processes of business partners/customers/suppliers (representatives or staff), the legal adaptation process, financial affairs, etc.), for our company's commercial, production, sales and marketing strategies to be determined and executed, the company's employment processes, execution of employee and workplace management in accordance with the personal data processing conditions and purposes which are mentioned in the 7th and 8th articles of the Law. Personal data may also be transferred abroad (to our suppliers, sellers, and marketers based abroad, computer programs, and software with servers based abroad, clouds, and servers for storage used in computers and other kinds of information technologies).

#### **v) The Management and Legal Reason for Gathering Personal Data**

Your personal data is gathered from all kinds of spoken, written or electronic settings with the purposes stated above in order to present the products and services our company provides, sells, markets, produces in accordance with the law, to ensure the diversification and continuity of commercial activities and to fulfill our contractual and legal responsibilities thoroughly and properly. Your personal data gathered by the legal reasons stated may be processed and transferred in accordance with the personal data processing conditions and purposes which are mentioned in the 5th and 6th articles of the Personal Data Protection Law and also with the purposes mentioned in the first and second articles of this text.

#### **vi) Sharing Your Personal Data With Third-Parties Within The Country**

Your personal data is transferred to companies, persons, banks, and insurance companies that supply us with products/services in support of our work and commercial activities. In addition to this, your personal data may be transferred for us to perform production, sales, marketing, storing, and similar commercial activities, to expert companies in our sector, to the computer programs, software, and/or the servers and clouds of the applications we use.

#### **Persons/Organizations we transfer the data gathered from Our Customers or Sellers:**

- Banks who ask for our general financial data (Balance sheets/Trial balance),
- Insurance companies/agencies for the dangers that can occur during transportations and shipments,
- Declarations similar to Tax Declarations, and Tax Offices (such as the proprietor who is paid rent or the worker who is issued a note of expenses),
- Revenue Offices, Tax Offices, and Courts in situations that are matters of legal investigations,
- Certified Public Accountants working with firms requesting a tax refund,
- The computer programs/software we use to track our sales and marketing activities.

## **Persons/Organizations we share and transfer personal data gathered from Our Employees:**

- With the Social Security Institution and Private Health Insurance companies to perform employment and insurance (Social Security Institution and Private Health Insurance) processes,
  - Insurance agencies/Insurance companies for Private Insurance procedures,
  - Banks for Salary Accounts,
  - Natural/legal persons we work with as a contractor for the continuity of our commercial work relations and natural persons/legal persons/companies/firms in third-party positions who demand legal documents about working in our company for entry to factory/production areas
  - Tourism agencies who act as intermediaries for visas for employees' work trips abroad
  - Natural/legal persons who are tendering authorities for personnel that is going to work in factories we work as subcontractors with,
  - KOSGEB for KOSGEB support,
  - Joint Occupational Safety and Health Services Organization for periodical health checkups.
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- Your personal data may be transferred to delivery/transportation companies to deliver our products and services to you.
  - At times that we need technical support, the consultancy companies we receive services from, and the telephone operating company may need to access our systems and in this way your personal data will be attainable for these companies. However, we take administrative and technical precautions to prevent these companies from using your personal data.
  - Your personal data is transferred to banks, other financial organizations, or our lawyer for us to collect debts.
  - A part of your personal data may be transferred to natural/legal persons who work with our company for the continuity of our commercial activities and to supply you with our products/services.
  - Your personal data may be transferred to our lawyers in order for us to use our right of defense and other legal rights, and in order for us to fulfill our legal responsibilities for a court ruling or when evidence is demanded.

### **vi) Sharing Your Personal Data With Third Parties Abroad**

- We may transfer your personal data to buyer groups abroad listed below.
- The abroad servers of applications, computer programs, software, and databases that record and keep the information, documents, files etc., that we create or procure as a part of commercial activities.
- The personal data gathered by our sales and marketing team is stored in a server abroad.

### **vii) Your Rights**

According to the Constitution of The Republic of Turkey, every person is entitled to the right to demand the protection of their personal data. Personal Data Protection Law no. 6698 was published about the protection of fundamental rights and liberties when this right is exercised and the procedures and principles the natural/legal persons who are processing personal data. Our company has paid maximum attention to obeying this law and made data protection a company policy with the "AKM Metalurji Policy Of Protection And Processing Of Personal Data".

The persons whose personal data was processed can demand information on the data about themselves, can learn why this information was gathered, how it was used, and the third parties that the personal data was transferred to, can demand this data to be corrected or updated in cases of it missing information or having been processed incorrectly and can demand it to be deleted including the notifications that will be made to third parties whom the data was transferred to.

## **vii) The Rights Of The Owner Of Personal Data Stated In Article No.11 Of The Personal Data Protection Law**

If you request to exercise your rights as a personal data owner with the methods stated in this clarification text, our company will bring your demand to a conclusion depending on its qualities, and free of charge. In the events of a payment charged by the Personal Data Protection Authority, our company will receive the payment in accordance with the directions of the Authority.

In this context the data owners are entitled to the rights listed below:

- To learn if personal data is being processed,
- To demand information if personal data was processed,
- To learn the purposes of the processing of personal data and if the data is being used for its suitable purpose,
- To know the third parties in or out of the country that the data is being transferred to,
- To request the deletion or destruction of personal data in accordance with the 7th article of The Protection of Personal Data Law,
- To request the notification of third parties the personal data has been transferred to in accordance with the subparagraphs (e) and (d) of the article no. 11 of The Protection of Personal Data Law
- To object to an outcome against themselves made by the analysis made by automated systems only,
- To demand their damage to be made up for as a result of personal data being processed against the law.

### **Application**

<b>Application Method</b>	<b>Application Address</b>	<b>Information Required To Apply</b>
<b>Applying personally (to apply in person with documents confirming the applicators identity)</b>	İTOSB, İstanbul Tuzla Org. San. Bol. 2. Cadde No: 13 Tepeoren 34959 Tuzla / İstanbul / Turkey	The envelope has to say “Information Request on Protection of Personal Data”.
<b>By Notification via the Notary</b>	İTOSB, İstanbul Tuzla Org. San. Bol. 2. Cadde No: 13 Tepeoren 34959 Tuzla / İstanbul / Turkey	The notification envelope must say “Information Request on Protection of Personal Data”.
<b>By Sending a registered e-mail signed with a “secure electronic signature”</b>	akm@hs01.kep.tr	The subject of the e-mail has to say “Information Request on Protection of Personal Data”.
<b>Via e-mail with an e-mail address notified to our company priorly or is registered to our system</b>	<a href="mailto:akm@akm.com.tr">akm@akm.com.tr</a>	The subject of the e-mail has to say “Information Request on Protection of Personal Data”.

You can request to exercise your rights stated above in writing, or other methods stated in the first paragraph of article no. 13 of The Protection of Personal Data Law. You must deliver your application personally to our company in accordance with the Law. In this context, the channels and methods you can provide us your application in accordance with article no. 11 of The Protection of Personal Data Law are explained below.

If you choose to exercise your rights stated above, you can submit your application with documents confirming your identity and the information needed, and with your explanations of the rights you choose to exercise stated in article no. 11 of the Protection of Personal Data Law by filling the form at [www.akm.com.tr](http://www.akm.com.tr), sending a signed copy of the form to ITOSB, İstanbul Tuzla Org. San. Bol. 2. Cadde No: 13 Tepeoren 34959 Tuzla / İstanbul / Turkey with documents confirming your identity personally or by certified mail, through a notary public, other methods stated in the Protection of Personal Data Law, send your application signed with a secure electronic signature to [akm@hs01.kep.tr](mailto:akm@hs01.kep.tr), or via e-mail with an e-mail address notified to our company priorly or is registered to our system sent to [akm@akm.com.tr](mailto:akm@akm.com.tr) with the subject of the e-mail saying "Information Request on Protection of Personal Data".

POLICY OF PROTECTION AND PROCESSING OF PERSONAL DATA [www.akm.com.tr](http://www.akm.com.tr)  
APPLICATION FORM [www.akm.com.tr](http://www.akm.com.tr)