

**KÖSEMEN MAKİNA PARÇA İMALİ
SAN. VE TİC. LTD. ŞTİ.**

**PERSONAL DATA PROTECTION AND
PROCESSING POLICY**

Document Name:

Kösemen Makina Parça İmali San. ve Tic. Ltd. Şti. Personal Data Protection and Processing Policy

Target Audience:

All natural persons, including employees, whose personal data are processed by Kösemen Makina Parça İmali San. ve Tic. Ltd. Şti.

Prepared by:

Kösemen Makina Parça İmali San. ve Tic. Ltd. Şti.

Version:

1.0

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01.09.2020

DEFINITIONS

Explicit Consent: Consent based on informed consent and expressed freely on a specific subject.

Anonymization : It is the change of personal data in such a way that it loses its personal data quality and this situation cannot be reversed.

Application Form : “Application Form for Applications to be Made to the Data Controller by the Relevant Person (Personal Data Owner) in Accordance with the Law on the Protection of Personal Data No. 6698”, which includes the application to be made by personal data owners to exercise their rights.

Employee Candidate: Real persons who have applied for a job or opened their CV and related information to Kösemen Makina by any means.

Business Partner: Parties with whom Kösemen Makina establishes business partnerships for purposes such as carrying out various projects or receiving services, either personally or together with Group Companies, while carrying out its commercial activities.

Processing of Personal Data: Any operation performed on personal data, such as obtaining, recording, storing, preserving, changing, reorganizing, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data, either fully or partially by automatic means or non-automatic means provided that it is part of any data recording system.

Personal Data Owner: The natural person whose personal data is processed. For example; customer, staff, visitor, etc.

Personal Data: Any information related to an identified or identifiable natural person. Therefore, the processing of information related to legal entities is not within the scope of the Law.

Special Personal Data: Data related to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, dress code, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data.

Third Party: Natural persons whose personal data are processed within the scope of the policy and who are not defined differently within the scope of the policy (e.g. family members, former employees).

Data Processor: Natural and legal person who processes personal data on behalf of the data controller based on the authority granted by the data controller.

Data Controller: The person who determines the purposes and means of processing personal data and manages the place where the data is systematically stored (data recording system). Within the scope of this policy; Kösemen Makina Parçaimali San.ve Tic.Ltd.Şti. is the data controller.

Data Deletion: This refers to the situation where all relevant users within the company encrypt personal data in a way that prevents access to it and only the data protection officer has this password.

Data Destruction: This refers to the situation where personal data is completely eliminated in a way that cannot be returned, either physically or through technological methods.

Visitor: Natural persons who have entered the physical premises owned by Kösemen Makina for various purposes.

1. CHAPTER 1 – INPUT

1.1 Introduction

The Law on the Protection of Personal Data numbered 6698 (“Law”) entered into force on April 7, 2016; Kösemen Makina Parça İmali San. ve Tic Ltd. Şti.’s Personal Data Processing and Protection Policy (“Policy”) aims to ensure compliance with the Law by Kösemen Makina Parça İmali San. ve Tic. Ltd. Şti. (“Kösemen Makina” or “Company”) and to determine the principles to be followed by Kösemen Makina in fulfilling its obligations regarding the protection and processing of personal data.

The Policy determines the conditions for processing personal data and sets forth the main principles adopted by Kösemen Makina in processing personal data. Within this framework, the Policy covers all personal data processing activities by Kösemen Makina within the scope of the Law, the owners of all personal data processed by Kösemen Makina and all personal data processed by it.

The protection of personal data is the responsibility of Kösemen Makina Parça İmali San. ve Tic. Ltd. It is among the important priorities of the company and Kösemen Makina makes maximum efforts to act in accordance with all legislation in force in this regard..

1.2 Scope

This Policy is related to all personal data of individuals, including our Company employees, processed by fully or partially automatic means or non-automatic means provided that it is part of any data recording system. Detailed information regarding the personal data owners in question can be found in ANNEX 2 of this Policy (“ANNEX 2 - Personal Data Owners”).

1.3 Implementation of the Policy and Related Legislation

The relevant legal regulations in force regarding the processing and protection of personal data will primarily be applied. In the event of inconsistency between the current legislation and the policy, our Company accepts that the current legislation will be applied. The policy regulates the rules set forth by the relevant legislation by concretizing them within the scope of Company practices.

1.4 Enforcement of the Policy

The effective date of this Policy is 01.09.2020.

2. CHAPTER 2 – ISSUES RELATING TO THE PROTECTION OF PERSONAL DATA

2.1. Ensuring the Security of Personal Data

In accordance with Article 12 of the Law, Kösemen Makina takes the necessary measures according to the nature of the data to be protected in order to prevent unlawful disclosure, access, transfer or other security deficiencies that may occur in personal data. In this context, our Company takes administrative measures, carries out inspections or has them carried out, in accordance with the guidelines published by the Personal Data Protection Board ("Board") to ensure the necessary level of security.

2.2. Protection of Special Personal Data

The law has given special importance to certain personal data due to the risk of causing

victimization or discrimination when processed illegally. These data are; data related to race, ethnic origin, political opinion, 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.

Kösemen Makina acts with sensitivity in protecting special personal data determined as “special” by the Law and processed in accordance with the law. In this context, the technical and administrative measures taken by Kösemen Makina for the protection of personal data are meticulously implemented in terms of special personal data and the necessary controls are provided within Kösemen Makina.

Detailed information on the processing of special personal data is provided in section 3.3 (“Processing of Special Personal Data”) of this Policy.ile biyometrik ve genetik verilerdir.

2.3. Increasing Awareness and Supervision of Business Units Regarding the Protection and Processing of Personal Data

Kösemen Makina ensures that the necessary training is organized for business units to increase awareness on preventing the unlawful processing of personal data, unlawful access to personal data and ensuring the preservation of personal data.

The necessary systems are established to raise awareness of Kösemen Makina employees on the protection of personal data, and when necessary, it works with consultants on the subject. In this regard, our Company evaluates the participation in relevant trainings, seminars and information sessions, and updates and renews its trainings in parallel with the update of the relevant legislation..

3. CHAPTER 3 – ISSUES RELATING TO THE PROCESSING OF PERSONAL DATA

3.1. Processing of Personal Data in Accordance with the Principles Stipulated in the Legislation

3.1.1. Processing in Accordance with Law and Fairness

Kösemen Makina acts in accordance with the principles brought by legal regulations and the general rule of trust and honesty in the processing of personal data. Within this framework, personal data is processed to the extent and limited to the business activities of our Company.

3.1.2. Ensuring Personal Data is Accurate and Up-to-Date Where Necessary

Kösemen Makina takes the necessary measures to ensure that personal data is accurate and up-to-date throughout the period it is processed and establishes the necessary mechanisms to ensure the accuracy and up-to-dateness of personal data for certain periods.

3.1.3. Processing for Specific, Clear and Legitimate Purposes

Kösemen Makina clearly states the purposes for which personal data is processed and processes it in line with its business activities and for purposes related to these activities.

3.1.4. Relevant, Limited and Proportionate to the Purpose of Processing

Kösemen Makina collects personal data only in the nature and to the extent required by its business activities and processes it limited to the specified purposes.

3.1.5. Retention for the Period Necessary for the Purpose for which they are Processed

or Envisaged

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

3.2. Conditions for Processing Personal Data

Unless the personal data owner gives explicit consent, the basis for personal data processing may be only one of the conditions specified below, or more than one condition may be the basis for the same personal data processing activity. If the processed data is special personal data, the conditions set out in heading 3.3 ("Processing of Special Personal Data") of this Policy shall apply.

i. Explicit Consent of the Personal Data Owner

One of the conditions for processing personal data is the explicit consent of the data owner. The explicit consent of the personal data owner must be related to a specific subject, based on information, and expressed with free will.

In the presence of the personal data processing conditions listed below, personal data can be processed without the need for the explicit consent of the data owner.

ii. Explicitly Provided in Laws

If the personal data of the data owner is clearly stipulated in the law, in other words, if there is a clear provision in the relevant law regarding the processing of personal data, the existence of this data processing condition can be mentioned.

iii. Failure to Obtain the Explicit Consent of the Person Concerned Due to Actual Impossibility

If the processing of personal data is necessary to protect the life or physical integrity of the person or another person who is unable to give his consent due to a de facto impossibility or whose consent cannot be validated, the personal data of the data owner may be processed..

iv. Direct Interest in the Establishment or Performance of the Contract

This condition may be deemed to be fulfilled if the processing of personal data is necessary, provided that it is directly related to the establishment or performance of a contract to which the data owner is a party.

v. Fulfillment of the Company's Legal Obligations

The personal data of the data owner may be processed if processing is necessary for our company to fulfill its legal obligations.

vi. Personal Data Owner's Making His/Her Personal Data Public

If the data owner has made his/her personal data public, the relevant personal data may be processed limitedly for the purpose of making it public.

vii. Data Processing is Necessary for the Establishment or Protection of a Right

If data processing is necessary for the establishment, exercise or protection of a right, the data subject's personal data may be processed. veri sahibinin kişisel verileri işlenebilecektir.

viii. Data Processing is Necessary for the Legitimate Interest of Our Company

Personal data of the data owner may be processed if data processing is mandatory for the legitimate interests of our Company, provided that it does not harm the fundamental rights and freedoms of the personal data owner.

3.3. Processing of Special Personal Data

Special personal data is processed by our Company in accordance with the principles set forth in this Policy and by taking all necessary administrative and technical measures, including the methods determined by the Board, and in the presence of the following conditions:

- (i) **Special personal data, other than health and sexual life**, may be processed without the explicit consent of the data owner if it is clearly provided for in the laws, in other words, if there is an explicit provision regarding the processing of personal data in the law governing the relevant activity. Otherwise, the explicit consent of the data owner will be obtained for the processing of such special personal data.
- (ii) **Special personal data related to health and sexual life** may be processed without explicit consent by persons or authorized institutions and organizations under a confidentiality obligation for the purposes of protecting public health, conducting preventive medicine, medical diagnosis, treatment and care services, planning and managing health services and their financing. Otherwise, the explicit consent of the data owner will be obtained for the processing of such special personal data.

3.4. Information to the Personal Data Owner

Kösemen Makina informs personal data owners in accordance with Article 10 of the Law and secondary legislation. In this context, Kösemen Makina informs the relevant persons as the data controller about who processes personal data, for what purposes, with whom it is shared and for what purposes, by what methods it is collected and the legal reason, and the rights of data owners within the scope of processing their personal data.

3.5. Transfer of Personal Data

Our company may transfer the personal data and special personal data of the personal data owner to third parties (third party companies, official and private authorities, third real persons) by taking the necessary security measures in line with the purposes of processing personal data in accordance with the law. In this regard, our company acts in accordance with the regulations stipulated in Article 8 of the Law. Detailed information on this subject can be found in ANNEX 3 of this Policy ("ANNEX 3 - Third Parties to Which Personal Data is Transferred by Our Company and the Purposes of Transfer").

3.5.1 Transfer of Personal Data

Even if there is no explicit consent of the personal data owner, personal data may be transferred to third parties by our Company, provided that one or more of the conditions specified below are met, by taking all necessary security measures, including the methods prescribed by the Board.

- • The relevant activities regarding the transfer of personal data are clearly prescribed by law,
- • The transfer of personal data by the Company is directly related to and necessary for the establishment or execution of a contract,
- • The transfer of personal data is mandatory for our Company to fulfill its legal obligation,
- • The transfer of personal data by our Company is limited to the purpose of publicity, provided that the personal data has been made public by the data owner,
- • The transfer of personal data by the Company is mandatory for the establishment, exercise or protection of the rights of the Company or the data owner or third parties,
- • The transfer of personal data is mandatory for the Company's legitimate interests, provided that it does not harm the fundamental rights and freedoms of the data owner,
- • The transfer of personal data is mandatory for the protection of the life or physical integrity of the person who is unable to express his/her consent due to a de facto impossibility or whose consent is not legally valid, or of another person.

In addition to the above, personal data may be transferred to foreign countries declared by the Board to have sufficient protection (“Foreign Country with Sufficient Protection”) if any of the above conditions are met. In the absence of sufficient protection, personal data may be transferred to foreign countries where the data controllers in Turkey and the relevant foreign country have undertaken to provide sufficient protection in writing and where the Board has granted its permission (“Foreign Country Where the Data Controller Undertakes to Provide Sufficient Protection”) in line with the data transfer conditions stipulated in the legislation.

3.5.2 Transfer of Special Personal Data

Sensitive personal data may be transferred by our Company in accordance with the principles set forth in this Policy, by taking all necessary administrative and technical measures, including the methods to be determined by the Board, and in the presence of the following conditions:

- (i) Personal data of a special nature, other than health and sexual life**, may be processed without the explicit consent of the data owner if it is clearly provided for in the laws, in other words, if there is an explicit provision in the relevant law regarding the processing of personal data. Otherwise, the explicit consent of the data owner will be obtained.
- (ii) Special personal data related to health and sexual life** may be processed by persons or authorized institutions and organizations under a confidentiality obligation, without seeking explicit consent, for the purposes of protecting public health, providing preventive medicine, medical diagnosis, treatment and care services, and planning and managing health services and their financing. Otherwise, the explicit consent of the data owner will be obtained.

In addition to the above, personal data may be transferred to Foreign Countries with Sufficient Protection if any of the above conditions are met. In the absence of sufficient protection, personal data may be transferred to Foreign Countries with a Data Controller Who Undertakes Sufficient Protection in accordance with the data transfer conditions stipulated in the legislation.

4. CHAPTER 4 – CATEGORIZATION OF PERSONAL DATA PROCESSED BY OUR COMPANY AND PURPOSES OF PROCESSING

In accordance with Article 10 of the Law and secondary legislation, the relevant persons are informed and, in line with the purposes of processing personal data of our Company, personal

data is processed in accordance with the general principles specified in the Law, primarily the principles specified in Article 4 of the Law regarding the processing of personal data, based on and limited to at least one of the personal data processing conditions specified in Articles 5 and 6 of the Law. Within the framework of the purposes and conditions specified in this Policy, the categories of personal data processed and detailed information about the categories can be accessed from the document Annex 1 of the Policy (“Annex 1- Personal Data Categories”).

Detailed information regarding the purposes of processing the personal data in question is included in Annex 1 of the Policy (“Annex 1- Personal Data Processing Purposes”).

5. CHAPTER 5 – STORAGE AND DESTRUCTION OF PERSONAL DATA

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

6. CHAPTER 6 – RIGHTS OF PERSONAL DATA OWNERS AND EXERCISE OF THESE RIGHTS

6.1. Rights of the Personal Data Owner

Personal data owners have the following rights:

- (1) To learn whether personal data has been processed,
- (2) To request information if personal data has been processed,
- (3) To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- (4) To know the third parties to whom personal data is transferred domestically or abroad,
- (5) To request correction of personal data if it is processed incompletely or incorrectly and to request notification of the action taken in this context to third parties to whom personal data is transferred,
- (6) To request deletion or destruction of personal data if the reasons requiring processing are eliminated despite the fact that it has been processed in accordance with the provisions of the Law and other relevant laws and to request notification of the action taken in this context to third parties to whom personal data is transferred,
- (7) To object to the emergence of a result against the person by analyzing the processed data exclusively through automated systems,
- (8) To request compensation for the damages incurred due to the processing of personal data in violation of the law.

6.2. Personal Data Owner's Exercise of Rights

Personal data owners may submit their requests regarding their rights listed in section 6.1 (“Rights of Personal Data Owners”) to our Company through the methods determined by the Board. In this context, data owners may reach our Company via the address Kösemen Makina Parça İmalî San. ve Tic. Ltd. Şti. Acısu Mahallesi Vatan Cadde No: 22/ Kartepe KOCAELİ or via the e-mail address kosemen@kosemenmakina.com, and our Company will finalize the request as soon as possible and within thirty days at the latest.

6.3. Our Company's Response to Applications

Our Company takes the necessary administrative and technical measures to finalize applications made by personal data owners in accordance with the Law and secondary legislation. If the personal data owner submits his/her request regarding the rights set forth in section 6.1 ("Rights of Personal Data Owners") to our Company in accordance with the procedure, our Company will finalize the relevant request free of charge as soon as possible and within 30 (thirty) days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board.

7. CHAPTER 7 – SPECIAL CASES WHERE PERSONAL DATA IS PROCESSED

7.1. Personal Data Processing Activities Conducted at Building and Facility Entrances and Within the Building and Facility

In order to ensure security, Kösemen Makina carries out personal data processing activities in its buildings and facilities, such as monitoring with security cameras and monitoring guest entries and exits.

7.2. Camera Surveillance Activities Conducted at Building and Facility Entrances and Inside

Kösemen Makina carries out camera monitoring activities in order to ensure physical space security in its buildings and facilities.

In accordance with Article 10 of the Law, Kösemen Makina informs the personal data owner with more than one method regarding camera monitoring activities. In addition, Kösemen Makina processes personal data in a limited and measured manner in connection with the purpose for which they are processed, in accordance with Article 4 of the Law.

The purpose of Kösemen Makina's video camera monitoring activities is limited to the purposes listed in this Policy. Accordingly, the monitoring areas, numbers and when the security cameras will be monitored are implemented in a sufficient and limited manner to achieve the security purpose. The privacy of the person is not monitored in areas that may result in interventions that exceed security purposes (e.g. toilets).

The Data Controller and the data contact officer have access to the records recorded and stored in the digital environment with live camera images.

7.3. Monitoring of Guest Entrances and Exits at Building and Facility Entrances

Kösemen Makina carries out personal data processing activities to monitor guest entries and exits in Kösemen Makina buildings and branches for the purposes of ensuring security and as specified in this Policy.

While the names and surnames of the persons who come to Kösemen Makina buildings as guests are obtained, the owners of the personal data in question are informed in this context through the texts provided to the access of the guests. The data obtained for the purpose of monitoring guest entries and exits is processed only for this purpose and the relevant personal data is recorded in the data recording system in a physical environment.

8. CHAPTER 8 – RELATIONSHIP OF THE PERSONAL DATA PROTECTION AND PROCESSING POLICY WITH OTHER POLICIES

As a general principle, Kösemen Makina's policies aim to ensure transparency and accountability regarding the personal data processing activities carried out by the company.

ANNEX 1 –Data Categories and Purposes of Processing Personal Data

Data Category	Purpose of Processing Personal Data
1-Identity	<ul style="list-style-type: none"> • Other-Legitimate Interest of the Company • Providing Information to Authorized Persons, Institutions and Organizations • Conducting Storage and Archive Activities • Conducting Occupational Health / Safety Activities • Conducting Communication Activities • Following and Conducting Legal Affairs • Conducting Finance and Accounting Affairs • Conducting Audit / Ethics Activities • Conducting Side Rights and Benefits Processes for Employees • Fulfilling Obligations Arising from Employment Contracts and Legislation for Employees • Conducting Application Processes of Employee Candidates • Conducting Selection and Placement Processes of Employee Candidates / Interns / Students • Conducting Emergency Management Processes • Conducting Training Activities • Conducting Internal Audit / Investigation / Intelligence Activities • Conducting / Auditing Business Activities • Conducting Contract Processes
2-Communication	<ul style="list-style-type: none"> • Providing Information to Authorized Persons, Institutions and Organizations • Conducting Occupational Health / Safety Activities • Conducting Communication Activities • Conducting Finance and Accounting Affairs • Fulfilling Employment Contract and Legislative Obligations for Employees • Conducting Application Processes of Employee Candidates • Conducting Selection and Placement Processes of Employee Candidates / Interns / Students • Conducting Emergency Management Processes • Conducting Training Activities
3-Location	<ul style="list-style-type: none"> • Other-Employee, Vehicle and Fuel Tracking

Data Category	Purpose of Processing Personal Data
4-Personality	<ul style="list-style-type: none"> • Providing Information to Authorized Persons, Institutions and Organizations • • Conducting Internal Audit/Investigation/Intelligence Activities • • Following and Conducting Legal Affairs • • Conducting Finance and Accounting Affairs • • Fulfilling Employment Contract and Legislative Obligations for Employees • • Conducting Candidate Employee/Intern/Student Selection and Placement Processes
5-Legal Action	<ul style="list-style-type: none"> • • Providing Information to Authorized Persons, Institutions and Organizations • • Conducting Contract Processes • • Following and Conducting Legal Affairs • • Fulfilling Employment Contract and Legislative Obligations for Employees • • Conducting Employee Candidate / Intern / Student Selection and Placement Processes
6-Customer Transaction	<ul style="list-style-type: none"> • • Execution of Goods / Services Sales Processes • • Execution / Control of Business Activities • • Execution of Finance and Accounting Affairs
7-Physical Space Security	<ul style="list-style-type: none"> • Ensuring the Security of Movable Goods and Resources • Ensuring the Security of Physical Spaces
8-Transaction Security	<ul style="list-style-type: none"> • • Execution of Information Security Processes • • Execution of Access Authorizations
10-Finance	<ul style="list-style-type: none"> • • Providing Information to Authorized Persons, Institutions and Organizations • • Carrying Out Finance and Accounting Affairs • • Fulfilling Obligations Arising from Employment Contracts and Legislation for Employees • • Carrying Out Employee Candidate / Intern / Student Selection and Placement Processes • • Carrying Out Side Rights and Benefits Processes for Employees • • Carrying Out Goods / Services Purchase Processes • • Carrying Out Goods / Services Sales Processes
11-Professional	<ul style="list-style-type: none"> • • Providing Information to Authorized Persons, Institutions and

Data Category	Purpose of Processing Personal Data
Experience	<p>Organizations</p> <ul style="list-style-type: none"> • • Implementation of Wage Policy • • Planning of Human Resources Processes • • Conducting Assignment Processes • • Fulfilling Employment Contract and Legislative Obligations for Employees • • Conducting Application Processes for Employee Candidates
13-Visual and Audio Recordings	<ul style="list-style-type: none"> • • Providing Information to Authorized Persons, Institutions and Organizations • • Fulfilling the Obligations Resulting from Employment Contracts and Legislation for Employees • • Conducting the Application Processes of Employee Candidates • • Conducting the Selection and Placement Processes of Employee Candidates / Interns / Students • • Ensuring Physical Space Security
16-Philosophical Beliefs, Religion, Sects and Other Beliefs	<ul style="list-style-type: none"> • • Other-Other-It is obtained due to the phrase "Religion" in the old type IDs, as required by the relevant legislation. It does not have a special processing purpose.
21-Health Information	<ul style="list-style-type: none"> • • Conducting Finance and Accounting Affairs • • Fulfilling Employment Contract and Legislative Obligations for Employees • • Conducting Candidate Employee / Intern / Student Selection and Placement Processes • • Conducting Application Processes of Candidate Employees • • Conducting Assignment Processes • • Providing Information to Authorized Persons, Institutions and Organizations
23- Criminal Conviction and Security Measures	<ul style="list-style-type: none"> • • Fulfillment of Employment Contract and Legislative Obligations for Employees
26-Other Information-Signature and Handwriting	<ul style="list-style-type: none"> • • Conducting Contract Processes • • Conducting / Supervising Business Activities • • Conducting Application Processes of Employee Candidates

ANNEX 2 –Personal Data Owners

Data Category	Data Subject Group
1-Identity	<ul style="list-style-type: none"> • • Supplier Officer • • Supplier Employee • • Intern • • Employee • • Employee Candidate • • Other-Dependents
2-Communication	<ul style="list-style-type: none"> • • Supplier Officer • • Supplier Employee • • Intern • • Employee • • Employee Candidate
3-Location	<ul style="list-style-type: none"> • Worker
4-Personality	<ul style="list-style-type: none"> • Intern • Employee
5-Legal Transaction	<ul style="list-style-type: none"> • Person Purchasing Product or Service • Supplier Representative • Employee
6-Customer Transaction	<ul style="list-style-type: none"> • Person Purchasing Product or Service
7-Physical Location Security	<ul style="list-style-type: none"> • Visitor • Product or Service Purchaser • Supplier Representative • Supplier Employee • Intern • Potential Product or Service Purchaser • Shareholder/Partner • Employee • Employee Candidate
8-Transaction Security	<ul style="list-style-type: none"> • Worker
10-Finance	<ul style="list-style-type: none"> • Person Purchasing Product or Service • Supplier Representative

Data Category	Data Subject Group
	<ul style="list-style-type: none"> • Intern
11- Professional Experience	<ul style="list-style-type: none"> • Employee • Employee Candidate
13- Audio and Visual Recordings	<ul style="list-style-type: none"> • Supplier Representative • Supplier Employee • Intern • Employee • Employee Candidate • Potential Product or Service Buyer • Product or Service Recipient • Visitor
16- Philosophical Beliefs, Religion, Sects and Other Beliefs	<ul style="list-style-type: none"> • Intern • Employee
21- Health Information	<ul style="list-style-type: none"> • Intern • Employee
23- Criminal Conviction and Security Measures	<ul style="list-style-type: none"> • Worker
26- Other Information-Signature and Handwriting	<ul style="list-style-type: none"> • Employee Candidate • Employee

ANNEX 3 – Third Parties to Which Personal Data is Transferred by Our Company and the Purposes of Transfer

In accordance with Articles 8 and 9 of the KVK Law, Kösemen Makina may transfer the personal data of data owners managed by this Policy to the following categories of persons:

- (i) Natural persons and private law legal entities,
- (ii) Business Partners,
- (iii) Authorized Public Institutions and Organizations,

The scope of the above-mentioned persons to whom the transfer is made and the purposes of data transfer are specified below.

Persons to Whom Data Can Be Transferred	Definition	Purpose of Data Transfer
Natural persons and private law legal entities	Works within the scope of the activities carried out by Kösemen Makina in order to fulfill its legitimate interests, legal obligations and/or obligations arising from contracts while carrying out its commercial activities.	Limited to legitimate interests, legal obligations and/or contractual obligations.
Business Partner	It defines the parties that Kösemen Makina establishes business partnerships with in order to carry out various projects and receive services, either personally or together with other companies, while conducting its commercial activities. Banks, companies that it receives business from, etc.	Limited to ensure that the purposes for which the partnership was established are fulfilled
Legally Authorized Public Institutions and Organizations	According to the relevant legislation, public institutions and organizations authorized to receive information and documents in Köseme Makine	Limited to the purpose requested by the relevant public institutions and organizations within their legal authority.