

1. PURPOSE

As **HASEL TEKNİK AHŞAP İNŞAAT OTOMOTİV SAN. VE TİC. LTD. ŞTİ. (HASEL TEKNİK AHŞAP / Company)** your privacy is respected and we are sensitive to your data security. With this awareness, we attach importance to the processing, safe use and protection of all kinds of personal data of the relevant people who are related to HASEL TEKNİK AHŞAP and who benefit from our products and services according to Turkish Privacy Law number 6698.

This text has been prepared in order to inform and enlighten you about our practices of collecting, processing, transferring, safe keeping and disposing of personal data within the scope of Turkish Privacy Law and other related legislation by **HASEL TEKNİK AHŞAP İNŞAAT OTOMOTİV SAN. VE TİC. LTD. ŞTİ.**

2. RESPONSIBLE PERSONNEL

Data Responsible : HASEL TEKNİK AHŞAP İNŞAAT OTOMOTİV SAN. VE TİC. LTD. ŞTİ.
Hacıaliler Köyü, 9835. Sokak No: 15 - PK: 81100 Düzce / TURKEY

Phone/Fax : +90 (380) 524 46 27 / +90 (380) 524 46 28

Web and E-mail : <https://www.haselahsap.com.tr>

KEP Mail : haselteknik@hs02.kep.tr

Contact Person : Ahmet Sönmez
ahmet.sonmez@haselahsap.com.tr
+90 (532) 511 80 50

Data Processors : All interested parties who process data on behalf of HASEL TEKNİK AHŞAP

3. SCOPE

Includes personal and private personal data of all interested parties collected, processed, transferred, archived and safely destroyed within all processes of **HASEL TEKNİK AHŞAP İNŞAAT OTOMOTİV SAN. VE TİC. LTD. ŞTİ.**

4. DEFINITIONS AND TERMS

Personal Data: It refers to all kinds of information about a specific or identifiable natural person. In the justification, whether a person is specific or identifiable is defined as making that person identifiable by associating the existing data with a natural person in any way.(Name, Surname, ID Number, Passport Number, Address, Phone Number, Entry-Exit Times, Areas/products they visit and transactions they take, Digital data stored in databases or files related to their locations, Job Applications/CV's, documents such as order records, Place of Birth/Birthday, Vehicle Plate, E-Mail Address/IP Address, Fingerprint, Audio and Video Records, All similar data that make the person identifiable),

Private Personal Data: Private personal data is a data that if learned that may cause discrimination or victimization about the person concerned. Therefore, they need to be protected much more strictly than other personal data. Private personal data can be processed with the express consent of the person concerned or in limited circumstances listed in the Law.(Race, Ethnicity, Political Thoughts, Philosophical Beliefs, Religion, Sect or other beliefs, Looks and Clothes, Association, Foundation or Union Membership, Health, Sexual Life, Criminal Conviction/Property Data, Data on Safety Measures, Biometric and Genetic Data),

Processing of personal data: Any transaction performed on personal data, including obtaining, saving, storing, changing, sharing with third parties and transferring abroad, of which personal data are automated or non-automated provided that they are part of any data recording system,

Turkish Personal Data Protection Law Number 6698(KVKK): The Law on Protection of Personal Data Number 6698, which was published in the Official Newspaper of Turkey on 7 April 2016,

Committee: Protection of Personal Data Committee

Express Consent: Approval given on a specific subject, based on information and free will, without any hesitation, limited only by that transaction.

Anonymizing: It is to make personal data unrelated to an identified or identifiable natural person by any means, even by matching with other data,

Related Person(Personal Data Owner): Real person whose personal data is processed. Example; Customers, suppliers, visitors, dealer / service employees, official institution employees, employees and employee candidates,

Data Processor: Real or legal person who processes Personal Data on his behalf, based on the authority given by the data responsible,

Data Responsible: Real or legal person who determines the purposes and means of processing Personal Data and is responsible for the establishment and management of the data recording system. It is he who determines the "why" and "how" of data processing in general.

Contact Person: Person who provides communication with the institution and contact with Data Owners. The contact person is not a representative of the Data Responsible. The contact person is the person who does not have the authority to act on behalf of the data responsible and the requests from the Institution are notified. (For questions and requests from Data Holders, there is no evaluation authority but only in the position to provide the contact.)

5. METHOD

As **HASEL TEKNİK AHŞAP İNŞAAT OTOMOTİV SAN. VE TİC. LTD. ŞTİ.**,

Our employees, trainees, customers and employees, potential customers and employees, suppliers and employees, employee candidates, visitors, business partners, institutions and employees with whom we cooperate and other related 3rd Parties / Relevant Persons;

We report that The Personal Datas we possess is collected, processed, transmitted, maintained and destroyed and as the Data Responsible, we state that we approach the issue with precision and care. The whole process is done according to Turkish Personal Data Protection Law Number 6698, Turkish Laws Numbered 6102, 4857, 6098, 5237, 5651 and other international conventions to which our country is a party, other relevant regulations and legislations.

5.1 Purpose of Collection, Processing Your Personal Data and Legal Reasons

Your personal data will be collected and processed within the scope and purpose defined below by our Company's Units, processes, social media channels, real or legal persons cooperated or authorized by our Company, official institutions and organizations and their employees through automatic or non-automatic methods, verbal, written, electronic or similar means/ways via communication forms, employee complaint forms, performance tracking and analysis, social networks, miscellaneous contracts, e-mails, correspondences, announcements, application forms, information request forms and quality records.

In accordance with Articles 4, 5 and 6 of KVKK your personal data will be processed;

- i. As required by the law and honesty rule,
- ii. Limited and measured in relation to the processing purposes
- iii. Accurate and updated,
- iv. For specific clear and legitimate purposes
- v. As long as required by the conditions and purpose foreseen or processed in the relevant legislation.

Additionally;

- ✓ Meeting your expectations and demands as our Customers, Suppliers, Employees and all related 3rd Parties within the scope of the products and services you receive,
- ✓ Getting to know your wishes and needs by better knowing you, responding to your demands and needs faster, measuring your satisfaction, eliminating complaints and nonconformities and making repetitions.,
- ✓ Supporting your product, service and payment preferences related to you,
- ✓ Improving and diversifying our products, services and communications, contacting you if you request information,
- ✓ Realization of location and power determination services that will be the basis for preliminary exploration studies in order to determine the energy needs of our customers and potential customers.,
- ✓ Necessary works / processes that can help us offer personalized content and offers are done by our business units,
- ✓ Planning and execution of corporate communication activities,
- ✓ Meeting your purchase demands, determining and approving contract terms,
- ✓ Planning and execution of finance, accounting, logistics activities,

- ✓ Planning and execution of legal activities,
- ✓ Planning and execution of our products and services within the scope of sales, marketing and bidding processes,
- ✓ Ensuring the necessary quality follow-up of our products and services, creating quality records and proofs, conducting audits related to Management Systems and other related standards,
- ✓ Making the reports foreseen by the legislation, managing our legal, commercial, financial, administrative operations with the related parties with whom we have a business relationship, determining commercial and business strategies and fulfilling our other obligations,
- ✓ Ensuring safe passage procedures from the areas where entry and exit are made when you visit our company,
- ✓ Planning, auditing and execution of information security processes, creating and managing the infrastructure of information Technologies
- ✓ Meeting the requirements of Turkish 5651 Log Law within the scope of using our guest internet network,
- ✓ Providing communication with us on our website, performing our support services,
- ✓ Within the scope of our System Security, movement traces of activities and applications performed during your active period in the system,
- ✓ Fulfillment of expectations based on regulations and requests reported by all relevant government agencies,
- ✓ Fulfilling the demands of the customers, business partners and senior management under the strategic planning of the company,
- ✓ Conducting your job application process, making your evaluation, getting information from your references within the scope of our company's human resources needs and policies,
- ✓ Ensuring the execution of our company's human resources policies, fulfilling our legal and legal obligations,
- ✓ Within the scope of the Labor Law, Labor and Social Security Legislations, our Human Resources Policy and other legislation in force, the evaluation of your opinions, opinions and suggestions we value as our employees, Ensuring the performance of the service processes, occupational safety and work peace of the data/information/expressions declared in all records related to "Employee Satisfaction" or "Employee Performance", which are voluntarily participated,
- ✓ Taking health data from our employees during the recruitment process, carrying out the health control process in certain periods, within the scope of the obligations stipulated by Labor Law, Labor and Social Security Legislation, our Human Resources Policy and other legislations in force,
- ✓ Following the reporting processes and/or legal requests of our employees, as required by the legislation, realizing the legal, technical and commercial obligations of the related parties in business relationship, ensuring occupational safety,
- ✓ Informing our employees to their relatives in case of emergency,
- ✓ Performing entry and exit tracking and analysis of our employees,
- ✓ Making Salary, Premium, Travel Expenses, Advance and Social Aid payments,
- ✓ Announcements of our fairs, events, sponsorships and promotional organizations, management of promotional and advertising operations after the events,
- ✓ Processing of the data of our employees within the scope of individual pension insurance,

Your personal and private personal data are collected processed and recorded in our systems, kept safe in legal period and destroyed safely at the end of need(legal period).

Personal data processed:

Personal Data	
ID	Name-Surname, ID Number, Tax Identification Number, Nationality Information, Mother and Father Name, Place of Birth, Birthday, driver's license, copy of identity card and documents like passports and signature/initial information etc.
Contact	Phone number, full address information, e-mail address, internal contact information (including internal number and corporate email address), contact information of close relatives, registered e-mail address (KEP)
Location	Current location information, place of residence, home address, city, unit, service route
Personnel Information	Any personal data processed to obtain information that will be the basis for the formation of personal rights of real persons who have a working relationship with our company (Identity information included in the personal file, job application form, mug shot, education information, graduation information, diploma copy, profession, previously worked location, CV information, individual retirement information)
Legal Actions	Determination of legal receivables and rights and execution of debts and legal obligations, personal data processed within the scope of compliance with our company policies and file and debt information on enforcement proceedings (Information contained in documents such as court and administrative authority decisions)
Customer Transactions	Personal data processed in order to ensure our technical, administrative, legal and commercial security by conducting commercial activities (Information that indicates the person authorized to match that person and the transaction associated with the person concerned) (User name, password and registration information)
Workplace Security	Personal data regarding the records and documents received during the stay in the workplace and at the entrance of the work; camera records, fingerprint records, face scan records, ID received at security point, contact information
Transaction Security	IP address information, web site login and exit information, user name and password information, authority access records, authority access log records
Finance	Financial and salary details, payrolls, premium entitlements, premium amounts, file and debt information on enforcement proceedings, bank account number, IBAN number, bank passbook, minimum subsistence information, private health insurance and life insurance amount, bank loan application and follow-up records
Professional Experience	Personal information related to the promotion process, experience describing papers, diploma information for the assignment process, expertise documents, professional experience records
Audio and Video Recordings	Photographs and camera recordings (visual data received within the scope of Workplace Security, videos, photographs, interviews etc. obtained within the scope of fair, organization, event etc.)
Other Information- Personal Information	Smoking, alcohol and drug use information, sponsorship request information

Private Personal Data

Looks and Clothes	Clothing size measurements within the scope of business activities
Medical Information	Within the scope of OHS doctor examination and reporting, the general illness, blood group information of the employee (in case of urgent need, sharing is made by giving the clear consent of the needy by informing the relevant parties by e-mail), health report
Criminal Convictions and Security Measures	Criminal records, GBT Registration
Genetical Data	Health information of family history within the scope of OHS doctor examination and reporting

Our Data Subject Group of People, whose personal data we process within the above-mentioned purposes; Employee Candidate, Employee, Customer Officer, Customer Employee, Public Institution Establishment Officer, Person subject to the news, Shareholder/Partner, Potential Product or Service Buyer/Customer, Intern, Supplier Employee, Supplier Authority, Product or Service Person, Parent/Guardian/Representatives and Visitors.

5.2 Transfer of Your Personal Data

Your personal data is transferred in the country or abroad with necessary administrative and technical measures taken, for the purpose of the products and services we provide to our customers and employees, suppliers and employees, our employees, business partners, affiliates and subsidiaries, our official institutions, organizations and employees, in line with the KVKK and the legislation in force, for the purposes listed above, within the framework of the personal data processing conditions and purposes specified in Article 8 and Article 9 of the KVKK.

In addition, our websites and social networks, where we serve you within the scope of our processes, collect your data and share by adhering to KVKK conditions, are presented for your information below.

Web Site : <https://www.haselahsap.com.tr>
Facebook : <https://www.facebook.com/HaselTeknikAhsap>
Twitter : <https://twitter.com/HASELAHSAP>
Instagram : <https://www.instagram.com/haselahsap/>
Linkedin : <https://www.linkedin.com/company/hasel-teknik-ahşap>

There is no obligation for your personal data you have shared with us from these websites, we take care to get enough information to meet your needs and demands.

5.3 Storing and Destroying the Data

Our company stores the personal data it processes according to the following legal periods determined in the legislation, company procedures and policies. If there is no time period specified in the legislation; Depending on the services provided by our company while processing that data, the personal data is kept for the period that requires the processing of our Company in accordance with the practices of our business life, and after this period, only for the purposes set forth in order to constitute evidence in possible legal disputes.

Personal Data Storing Durations

Data Categories	Data Storing Duration	Data Categories	Data Storing Duration
ID	15 Years	Finance	15 Years
Contact	15 Years	Professional Experience	15 Years
Location	Until Communication Made	Audio and Video Recordings	Constantly from Social Media
Personnel Information	15 Years	Looks and Clothes	Duration of Employment
Legal Actions	10 Years	Medical Information	15 Years
Customer Transactions	10 Years	Criminal Convictions and Security Measures	Duration of Employment
Workplace Security	6 Months	Genetical Data	15 Years
Transaction Security	Minimum 2 Years	Other / Smoking, alcohol and drug use information	15 Years

After the expiration of the specified periods, the personal data in question is determined by the methods defined in the "Documentation and Records Control Procedure" and the relevant company procedures and policies (printed / manual records with clipping machines or burning method, and the electronic media with irrecoverable deletion methods) and it is deleted, destroyed or anonymized.

5.4 Your Rights as a Personal Data Owner

According to Article 11 of KVKK;

- i. Learning whether your personal data is processed,
- ii. If your personal data is processed, requesting information about it,
- iii. Learning the purpose of processing personal data and whether they are used in accordance with its purpose,
- iv. To know the third parties to whom your personal data is transferred domestically or abroad,
- v. Request correction if your personal data is missing or incorrectly processed,
- vi. Request your personal data to be deleted or destroyed within the conditions stipulated in KVKK legislation,
- vii. If you request the correction of missing or incorrect data and your personal data to be deleted or destroyed, request that this be notified to third parties to whom your personal data has been transferred.,
- viii. To object to the emergence of a result against you by analyzing the processed data exclusively through automated systems,
- ix. Requesting the removal of this damage if you suffer damage due to illegal processing of personal data, you have these rights

In order to use your rights mentioned above, your written request should be send with the necessary information to determine your identity and your explanations about the right you want to use;

- ✓ The applicant could personally apply with wet signed “**Personal Data Request Form**” or send mail to following address “**HASEL TEKNİK AHŞAP İNŞAAT OTOMOTİV SAN. VE TİC. LTD. ŞTİ. Hacıaliler Köyü, 9835. Sokak No: 15 - PK: 81100 Düzce / TÜRKİYE**”
- ✓ By sending wet signed “**Personal Data Request Form**” via notary to following address “**HASEL TEKNİK AHŞAP İNŞAAT OTOMOTİV SAN. VE TİC. LTD. ŞTİ. Hacıaliler Köyü, 9835. Sokak No: 15 - PK: 81100 Düzce / TÜRKİYE**”
- ✓ The “secure electronic signature” defined in the Electronic Signature Law No. 5070 by the Applicant with your identity declaration, you can send e-mail to our e-mail addresses “haselteknik@hs02.kep.tr”, “ahmet.sonmez@haselahsap.com.tr” “info@haselahsap.com.tr”.

Your applications should be made Turkish or English.

In the application that contains your explanations about the right that you have as a personal data owner and that you have made and requested to use your rights mentioned above you need to make sure;

- ✓ The issue subject you have requested is clear and understandable,
- ✓ Originally signed written consent of the owner of personal data,
- ✓ The subject you requested is related to you personally,
- ✓ If you are acting on behalf of someone else, you should have special authority in this matter and document your authority,
- ✓ The application should contain identification and address information (address or place of residence based on notification, e-mail address based on notification, telephone or fax number if any)
- ✓ Documents evidencing your identity(T. C. identification number for citizens of the Republic of Turkey, for the foreigners nationality, passport number/ID number, etc.) about the mentioned articles above.

Your applications sent to us will be answered within thirty days from the date of your request, according to the second paragraph of Article 13 of the KVKK, according to the nature of the request. Our responses will be sent to you in writing or electronically in accordance with the provisions of article 13 of the KVKK. Personal data owner, in accordance with Article 14 of the Law No. 6698, in case the application is rejected, the answer given is insufficient or the application is not answered in due time; may complain to the Committee within thirty days of Company’s respond, and in any case, within sixty days from the date of application, with the consent of the personal data owner. In the event that a cost arises within the context of Article 13 of the Law, the Company reserves the right to request a fee from you according to the tariff to be determined by the Personal Data Protection Committee

In accordance with Article 28/2 of KVKK; Personal data holders cannot claim their other rights mentioned above, except for the right to demand compensation for damages in the following cases:

- ✓ Personal data processing is necessary for the prevention of crime or for criminal investigation.
- ✓ Processing of personal data personalized by the personal data owner.
- ✓ Based on the authority given by law, personal data processing is required by the public institutions and organizations and professional institutions that are public institutions, to carry out auditing or regulatory duties and for disciplinary investigation or prosecution.
- ✓ The personal data processing is necessary for the protection of the State's economic and financial interests in relation to budget, tax and financial matters.

5.5 Cases Where HASEL TEKNİK AHŞAP Can Process Your Personal Data Without Your Explicit Consent In Accordance With KVKK

In accordance with Article 5 of KVKK, in the following cases **HASEL TEKNİK AHŞAP** can process your personal data mentioned above and obtained in accordance with the law, without seeking your express consent:

- ✓ Where clearly prescribed by law,
- ✓ If you are unable to disclose your consent as a data owner due to de facto impossibility, or if your consent is not legally valid, your personal data must be processed to protect yourself or someone else's life or bodily integrity.
- ✓ **HASEL TEKNİK AHŞAP** and its related companies, it is necessary to process the personal data of the parties of the contract, provided that it is directly related to the establishment or performance of a contract you have signed with other real and/or legal persons specified in Article 3.
- ✓ It is mandatory for **HASEL TEKNİK AHŞAP** to fulfill its legal obligation,
- ✓ Your personal data has been publicized by you,
- ✓ Data processing is mandatory for the establishment, use or protection of a right,
- ✓ Data processing is mandatory for the legitimate interests of **HASEL TEKNİK AHŞAP**, provided that it does not harm your fundamental rights and freedoms.

The relevant legal regulations in force in the processes within the scope of the Disclosure Text regarding the Collection, Processing, Transfer, Storage and Disposal of this Personal Data will be implemented with priority. If there is a discrepancy between the current legislation and the Clarification Text, the Data Officer acknowledges that the applicable legislation will find application.

KVKK Notifying Text came into force on 24.12.2019, was published under the Management Systems Documentation available on our website, <https://www.haselahsap.com.tr/>, and on our server and made available to our employees and all interested parties. In order to comply with the changing conditions and legislation, the publication date will be updated and announced again if the entire text or specific articles are renewed.

6. ANNEXES AND RELATED DOCUMENTS

- ✓ Personal Data Protection Law No. 6698
- ✓ Safe Collection, Processing, Transfer, Retention and Destruction Policy of Personal Data
- ✓ Personal Data Request Form
- ✓ Information Security Policies
- ✓ Documentation and Records Control Procedure
- ✓ Resource Management Procedure