Purpose of Personal Data Protection and Processing Policy:

We, as Emas Demir Celik San. ve Dis Tic. Ltd. Sti. A.S., show utmost sensitivity to the security of your personal data. With this awareness, we attach great importance to the processing, recording, transferring, sharing, and storing of all personal data belonging to all persons related to our Company, including those who benefit from our products and services, in accordance with the Personal Data Protection Law No.6698 ("KVK Law" / PDPL).
The protection of personal data is among the essential policies of our Company and our company has given priority to the privacy of personal data during its existence, has adopted this as a working principle, and instructed its employees to work in line with this principle. Our company accepts and undertakes to comply with all the responsibilities brought by the PDPL. With full awareness of this responsibility and as Data Controller, we process, record, transfer, share and store your personal data as described below and within the limits prescribed by official legislation.

For your questions regarding our Company's "Clarification Text on Processing Personal Data", you can contact us using the following contact information:
http://www.emasdemircelik.com.tr/. Our company always reserves the right to update this "Clarification Text on Protection of Personal Data" within the framework of the changes that can be made in the current official legislation.

Collection and Processing of Personal Data and Purposes of Processing:

Our company's policy on "Protection and Confidentiality of Personal Data" has been prepared in accordance with the PDPL. In this context, your personal data may vary depending on the services, products or commercial activities provided by our Company, and they may be collected verbally, in writing or electronically through offices, branches, dealers, call center, website, social media channels, mobile applications and similar tools by automatic or non-automatic methods. As long as you benefit from our company's products and services; Your personal data can be processed by being created and updated.

In addition, with the intention of using the services of our Company, when you
a. use our website,
b. visit our company, website, or social media channels/mediums,
c. attend training, seminars or organizations organized by our company
Your personal data may be processed.

Your personal data which are obtained from you with your expressed consent or in accordance with other reasons of compliance with the law stated in the laws of the Republic of Turkey:
For the following purposes of;

a. being able to perform the necessary work by our business units to make you benefited you from the products and services offered by our company,
b. customizing the products and services offered by our company according to your taste, usage habits, and needs and recommending them to you,
c. ensuring the legal and commercial security of our company and those who are in business relations with our company (Administrative operations for communication performed by our company, ensuring the physical security and supervision of the company's locations, business partner / customer / supplier (authorized or employees) evaluation processes, legal compliance process, financial affairs, etc.),

d. improving the services provided by our company and improving our quality policy,
e. making you be informed and enabling you benefited from the general and special campaigns, promotions, promotions, discounts and similar advantages offered by our company,
f. being able to process the data obtained together with your personal data, preferences, transactions, and browsing time in the relevant channels in order to provide you with the information and services you have requested when you log in with your username and password in order to get service from the channels offered by our company;
g. being able to make notifications (renewal, termination, etc.) regarding all kinds of loyalty cards issued and/or to be issued by our company and its associated companies/organizations and website memberships of our Company and its associated companies/organizations, and informing you about all kinds of communication that may be established with you, new services and products to be offered, as well as changes, innovations, and similar issues that may occur in personal data policies and membership conditions,
h. informing you about the information, events and services you request from our company,
i. determining and implementing our company's commercial and business strategies,
j. ensuring the execution of the human resources policies of our company and fulfilling a legal obligation determined by the legislation in case, it is clearly stated in the legislation or if necessary,

within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the PDPL; They can be processed by our Company and its associated companies/organizations and other real and/or legal entities specified in Article (C) below.

THE METHOD AND LEGAL REASON OF COLLECTING PERSONAL DATA:

Your personal data is obtained in all kinds of verbal, written, or electronic media, in order to provide our Company's products and services within the legal framework determined for the purposes, stated in the above articles and in this context, in order to fulfill our Company's contractual and legal responsibilities in a complete and accurate manner. Your personal data collected for this legal reason are processed, recorded, transferred, shared, and stored for the purposes specified in article (B) of this text within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of PDPL.

PROCESSING OF DATA WITH SPECIAL QUALITY

According to PDPL, people's race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, dress and clothing, association, foundation or union membership, health, sexual life, criminal conviction and security measures and biometric data and its genetic data are personal data of special nature. Our company also takes adequate measures determined by the Personal Data Protection Board in the processing of special quality data. In order to provide better service, our company will only process special quality data of individuals with the consent of the relevant person and only for the purpose of collection.

PROCESSED PERSONAL DATA TO WHOM AND FOR WHICH PURPOSE CAN THOSE BE TRANSFERRED:

In order for your collected personal data to serve the purposes specified in Article (B), they can be transferred to our shareholders, business partners, suppliers, legally authorized public institutions, and private persons, in addition to the company Emas Demir Celik San. ve Dis Tic. Ltd. Sti., within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the PDPL.

Transfer of Personal Data Abroad:

Our company has the authority to transfer personal data abroad within the conditions determined by the Personal Data Protection Board in PDPL, in accordance with the other conditions in the law and after obtaining the express consent of the person for this purpose.

Rights of Personal Data Owner mentioned in Article 11 of PDP Law:

Within the scope of PDPL, we acknowledge that the relevant person has the right to be informed and his/her consent should be obtained before the processing, recording, transfer, sharing, and storage of his / her personal data, and he/she has the right to determine the fate of the data after the data is processed, recorded, transferred, shared and stored.
In this context, if you submit your requests regarding your rights as personal data owners in this "Clarification Text on the Processing of Personal Data", by the methods set out below, to our Company; Our company will finalize the request free of charge, within thirty days at the latest, depending on the nature of the request.
Pursuant to the "Communiqué on the Procedures and Principles of Application to the Data Controller" published by the Personal Data Protection Board, Regarding your requests in relation to your rights as personal data subjects (owners);

i. If your application is to be answered in writing, up to ten pages will not be charged. A transaction fee of 1.00 TL can be charged for each page above ten pages.
ii. In case the answer to the application is given in a recording medium such as a CD or flash memory, the fee that may be requested by our Company as a data controller shall not exceed the cost of the recording medium.

In this context, personal data subjects have the following rights of

a. Learning whether your personal data is processed or not,
b. Requesting information if the personal data has been processed,
c. Learning the purpose of processing your personal data and whether they are used appropriately for their purpose,
d. Learning the third parties to whom your personal data is transferred domestically or abroad,
e. In case your personal data is incomplete or incorrectly processed, to request their correction and the action taken within this scope, requesting the notification of your personal data to third parties,
f. Requesting the deletion, destruction or anonymization of personal data within the framework of the conditions stipulated in Article 7 of PDPL, and requesting that the process carried out within this scope be notified to third parties to whom personal data is transferred,
g. Object to the occurrence of a result against the individual himself/herself by exclusively analyzing the data processed through automated systems,
h. Requesting compensation for the damage in case of damage due to unlawful processing of personal data. In any event, individuals do not have a right regarding anonymized data within the Company. Our company may share personal data with relevant institutions and organizations in order to exercise the legal powers of a judicial duty or state authority in accordance with the business and contractual relationship.

The Periods that Your Personal Data will be Processed:

Your personal data processed for the purposes specified in this "Clarification Text on Processing Personal Data" in accordance with PDPL, and according to the article 7/f.1 of the PDPL, when the purpose requiring processing is eliminated and/or when the time-out periods that we are required to

process your data in accordance with the legislation; Your personal data will be deleted, destroyed or continued to be used by being anonymized by us.

The cases where our company may process your personal data without your explicit consent as per the laws:

Pursuant to Article 5 of PDPL, our Company may process your personal data that it has received without your express consent and in accordance with the law, in the following cases:
The situations that are clearly stipulated in the laws;
i. In case you are unable to disclose your consent as a data subject due to the actual impossibility, or in case your consent is not legally valid, it is necessary to process your personal data in order to protect your or someone else's life or body integrity,
ii. In case our company and its associated companies/organizations are directly related to the establishment or execution of a contract you have concluded with other real and/or legal persons specified in Article (C), it is necessary to process personal data of the parties to the contract,
iii. In case it is mandatory for our company to fulfill its legal obligation,
iv. In case your personal data has been made public by you,
v. In cases where data processing is mandatory for the establishment, use, or protection of a right,
vi. In case of necessity of data processing for the legitimate interests of our Company, provided that it does not harm fundamental rights and freedoms that you have.

In order to make a request in accordance with the Personal Data Protection Law:

Pursuant to paragraph 1 of article 13 of PDPL, you can submit your request to use your above-mentioned rights to our Company with the method(s) determined / to be determined by the Personal Data Protection Board. Alternatively, if you desire, you can send your application in writing to our Company in accordance with the PDPL. In order to do this, firstly sign the form at the URL address. Then, choose one of the following methods and send the form to our Company;

i. You can personally send a signed copy of the form containing your explanations about your requested right to the address below;
Sumer Cad. Nur Is Hani Kat: 1 No: 2 KARABUK with official documents that prove your identity (For example, a copy of your identity card).

ii. You can send the form you fill out and the official documents identifying your identity via Notary or,
iii. You can fill in the form and your identity documents electronically; You can send it to emasdemircelik@hs01.kep.tr with secure electronic signature or mobile signature,

iv. You can submit the form you will fill out and the documents identifying you to our Company to be delivered to the Data Officer by using the e-mail address you previously notified to our Company and registered in our Company's system. Our company will ensure that the request is concluded within 30 days at the latest, depending on the nature of the request. Rights regarding personal data can only be used for personal data. Requests for data of persons other than the person who filled out the form and have official documents identifying you in the attachment will not be taken into account. Forms that do not have official documents identifying you will not be taken into account. Even when data deletion requests are fulfilled, we inform you that we are obliged to share the data with the official authorities if requested by the official authorities.