



SARKUYSAN ELEKTROLİTİK BAKIR SANAYİ ve TİCARET A.Ş.

POLICY ON PROCESSING PERSONAL DATA

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POLICY ON PROCESSING PERSONAL DATA

The rights of natural persons over their own personal data are among the fundamental rights and freedoms as part of Article 20 of the Turkish Republic's Constitution. No one may process, use and store these data without the consent of the related data owner outside the extent of the law.

Sarkuysan Elektrolitik Bakır Sanayi ve Ticaret AŞ (SARKUYSAN or the Company) attaches great importance to the confidentiality and security of your personal data with this awareness.

This Policy text was prepared in order to inform personal data owners about how we process personal data, which purposes we use personal data for and how we protect the data we obtain while we conduct our business activities in relation to our potential or existing customers, our suppliers, our business partners, employees and representatives of these, employees of our Company, interns, subcontractors, officers and representatives of our subcontractors as well as employees of our subcontractors and all other third parties.

All concepts and terms used in this statement, herein, are used with their meanings attributed to them in the Personal Data Protection Law No. 6698 (PDPL) and other regulations. The term "you" mentioned in this Policy refers to yourself. The term personal data is also used to cover special categories of personal data as per the definition given in PDPL.

1. ABOUT SARKUYSAN

Sarkuysan has a significant place in the country's industrialization history as it is the first successful publicly traded and aggregate company. The Company, which produces electrolytic copper and products, copper tubes and copper busbars over a total area exceeding 180 decare in the Gebze and Darıca regions, with an indoor area of 77,000 square meters, increased its initial capacity of 10,000 tons/year to over 200,000 tons/year and became a global company.

The products are used as standard inputs in electro-technical, electronics, motor, communication, electricity generation and distribution, solar power, household appliances, measuring devices, defense, automotive, chemicals, construction, heating – ventilation and sanitary installation sectors. Sarkuysan is certified with TS EN ISO 9001, ISO/TS 16949 Quality, ISO 14001 Environment and OHSAS 18001 Health and Safety Management systems for all the operations carried out. Using the "SKS" brand on its products, Sarkuysan is the leader of its industry in Türkiye with its production and sales figures while also exporting a substantial part of its production range to 50 countries in 5 continents. Today, Sarkuysan wires are used in a significant number of cars and commercial vehicles produced in Europe. The Company has been providing oxygen-free and nickel-plated copper wires to the suppliers of NASA in the USA for years as well as the aircraft manufacturers lately.

The terms of "We" or "The Company" or "Sarkuysan" are associated with personal data processing activities conducted by the Data Controller which is Sarkuysan Elektrolitik Bakır Sanayi ve Ticaret A.Ş (Sarkuysan) registered with the number of 13898 at Kocaeli Trade Register operating at the address of Emek Mah. Aşıroğlu Cad. No:147 Darıca/Kocaeli.

2. LEGAL PRINCIPLES CONSIDERED AS A BASIS WHILE PROCESSING PERSONAL DATA

All personal data processed by our Company is processed in line with the PDPL and regulations, official

statements and resolutions issued based on this law. Essential guidelines and principles used during this processing activity are explained below:

- **Processing in Compliance with the Law and Principles of Integrity:** Our Company acts in accordance with the principles introduced by legislation and the general principles of trust and integrity in processing personal data. Accordingly, our Company considers the principles of proportionality in processing personal data and does not use personal data other than required by the purpose of processing. Our essential principle during the processing activity is to inform you fully and correctly in relation to the processing activity.
- **Having Personal Data Kept Accurate and Up-To-Date As Required:** Our Company ensures that the personal data processed is accurate and up-to-date, taking into account the fundamental rights of personal data owners and the Company's legitimate interests. Our Company commits to putting the best effort towards this purpose. As you would appreciate, however, the main responsibility rests with you. Our Company's ability to conduct personal data processing activity in accordance with the law runs naturally parallel with You making the necessary updates in time and in full in relation to your personal data.
- **Processing for Specific, Explicit and Legitimate Purposes:** Our Company conducts processing activity in line with legitimate and legal purposes. Your personal data are processed in line with the purposes found in the disclosure texts shared with you as well as Sarkuysan Policy on Personal Data Storage, Deletion and Destruction text. Detailed information related to processing purposes was publicly disclosed by our Company in the Data Controller Registry which was created and managed by the Personal Data Protection Agency.
- **Being in Connection, Limited and Proportionate with the Purpose of Processing:** Our Company processes personal data in a way that is suitable for the realization of the defined purposes and avoids processing personal data that is not related to the realization of the purpose or that is not required. Our Company processes personal data as much as required and in connection with the products and services provided.
- **Keeping Personal Data for As Long As Required by the Relevant Legislation or for the Purpose of Processing:** Our Company only keeps personal data for as long as required by the relevant legislation or for the purpose of processing. Accordingly, our Company initially determines whether or not a period is specified for the storage of personal data in the relevant legislation; if a period is specified, our Company acts accordingly; if a period is not specified, then our Company processes and stores personal data as long as required for the purpose of processing. Our Company deletes and destroys personal data at the end of the specified period or the reasons requiring processing of the data are no longer valid.

3. DATA OWNER CATEGORIES

Below table presents data owner categories whose personal data are processed by our Company other than our employees (including interns and sub-employer firm employees).

DATA OWNER CATEGORY	EXPLANATION
Employee Candidate	Natural persons who have provided their CVs directly to our Company in order to work with us and employee candidates whose information have been obtained through human resources companies due to our Company's needs, who have not yet signed an employment contract with our Company
Employee	Blue collar and white-collar personnel working at our Company
Potential Product or Service Buyer	Natural persons who are natural or legal persons' managers, representatives or employees which have conveyed their demand or interest to buy our products and/or to benefit from our services or which have been considered to have the potential of this interest in line with the customary practices and rules of integrity
Intern	Persons who have applied to our Company to do internship whose applications have been accepted
Employee of the Supplier	Personnel working at the supplier from which the Company provides all kinds of goods and services including subcontractors who provide personnel employment under any capacity,
Authorized Employee of the Supplier	Manager or representative of the supplier from which the Company provides all kinds of goods and services including subcontractors who provide personnel employment under any capacity
Product or Service Buyer	Natural or legal persons who buy our products and services
Shareholder / Partner	Natural person partners and legal person partners' manager, authorized employee or employee including investors who have been partner to the Company through acquisition of shares in the stock exchange due to the Company being a publicly traded corporation in BIST
Guest	All natural persons who visit our Company's facilities, factories, or offices
Other - Acquaintance of Data Owner, Employees of Subsidiaries and Group Companies	Acquaintances of data owners whose personal data are processed due to provision of insurance services, participation in organizations or similar reasons involving our Company's personnel and personnel who are employed by subsidiaries whose data are processed in order to conduct processes within the group

4. WHEN DO WE COLLECT YOUR PERSONAL DATA?

Your personal data are mainly collected through below given sources, including but not limited to general data collection sources;

- Business cards and similar information – documents shared during electronic mail

correspondences, telephone interviews or face-to-face interviews as part of marketing and product promotion activities conducted before product purchasing process,

- Contracts of product purchase, forms, appendixes to contracts including signature circulars, trade registries, invoices, bank details and similar information – documents,
- Forms, information – documents received as part of complaints, demands of product returns received by our Company after product sales or with any other reasons,
- Business cards and similar information – documents shared during electronic mail correspondences, telephone interviews or face-to-face interviews as part of marketing and product promotion activities conducted before product purchasing process in relation to our Company's suppliers,
- Information obtained during security checks at the visits to our Company's facilities and factories as well as offices and information and documents shared during free Wi-Fi connection provided to our visitors by our Company as well as IP numbers recorded during Wi-Fi connection,
- Security cameras located at different points in our offices, factories, and our Company's facilities,
- CVs received by our Company during job and internship applications, information obtained through human resources companies, filled forms, provided diplomas and similar education documents,
- Obtained health reports during recruitment process, filled forms, and obtained information as part of employment contract, health reports, treatment and disease information obtained routinely or individually during the employment,
- Application forms for events, seminars, conferences, and organizations organized by our Company in relation to participation, photography or video recordings at these events or organizations

5. WHICH PERSONAL DATA DO WE PROCESS?

Personal data we process in relation to you depends on the type of relation we have (customer, supplier, business partner, employee, intern, etc.) and your method of communication with us (e.g. telephone, email, printed material etc.). As part of this, personal data we process in relation to you may be explained under the following categories:

DATA CATEGORIES	EXAMPLES
Personal Identifiable Information	Name-surname, name-surname of mother-father, mother's birth name, date of birth, place of birth, marital status, serial/item number of ID card, Turkish ID number, etc.
Contact Information	Mail address, e-mail address, communication address, registered electronic mail address (KEP), phone number, etc.
Location Information	Current location, GPRS, tracking information
Personnel Information	Payroll information, discipline investigation, records of statement of employment and end of employment, declaration of property information, CV information, performance assessment reports, etc.
Legal Action	Information in the correspondence to legal authorities,

	information in case files, etc.
Customer Transactions	Call center records, information on bills, bonds, cheques, counter receipts, ordering information, request information, etc.
Physical Venue Security	Records of employees and visitors entering-exiting the venue, cam records, etc.
Transaction Security	IP address information, website entry and exit information, password, and code information, etc.
Financial Information	Information on financial statements, financial performances, credits and risks, shareholding, assets, etc.
Professional Experience	Information related to diplomas, courses taken, professional training, certificates, transcripts, etc.
Audio and Visual Recordings	Audio and visual records, etc.
Philosophical Beliefs, Religions, Sects and Other Beliefs	Information related to religious beliefs, information related to philosophical beliefs, information related to sects, information related to other beliefs, etc.
Association Membership	Information on association memberships, etc.
Foundation Membership	Information on foundation memberships, etc.
Union Membership	Information on union memberships, etc.
Medical Information	Information related to disability, information of blood type, personal health information, used devices and prosthesis information, etc.
Criminal Conviction and Security Measures	Information on criminal conviction, information on security measures, etc.

6. WHY DO WE USE YOUR PERSONAL DATA?

Our purposes for using your personal data naturally vary depending on the legal relation type we have (e.g. customer, supplier, business partner, employee, intern, etc.). All our processing activities are limited to these purposes and to the data required and needed to fulfill these purposes.

- Conducting emergency management processes
- Conducting information security processes
- Conducting employee candidate / intern / student selection and placement processes
- Conducting application processes for employee candidates
- Conducting employee satisfaction and loyalty processes
- Fulfilling obligations arising from employment contract for employees and regulation
- Conducting benefits and rewards processes for employees
- Conducting audits / ethical activities
- Conducting education activities
- Managing access authorizations
- Conducting activities in accordance with the regulation
- Carrying out financial and accounting works
- Providing physical venue security
- Following up and conducting legal works
- Conducting communication activities
- Planning human resources processes
- Conducting / supervising work activities
- Carrying out occupational health and safety activities
- Taking measures to improve work processes and assessing these measures
- Carrying out activities to enable work continuity
- Conducting logistic activities
- Conducting purchasing processes of products / services
- Conducting support services after product / service sales
- Conducting sales processes of products / services
- Conducting production and operation processes of products / services
- Carrying out customer relations management processes
- Carrying out activities for customer satisfaction
- Managing organizations and events
- Conducting marketing analysis studies
- Carrying out performance assessment processes
- Carrying out risk management processes
- Conducting social responsibility and civil society activities
- Carrying out contractual processes
- Carrying out strategic planning activities
- Providing security for movable goods and resources
- Carrying out supply chain management processes
- Carrying out wages policy
- Conducting marketing processes of products / services
- Providing security for data controller operations
- Conducting foreign personnel work and residence permit processes
- Carrying out skill / career development activities
- Informing authorized persons, institutions, and organizations

- Conducting management activities
- Creating and tracking visitor records

7. WHAT ARE OUR LEGAL REASONS FOR PROCESSING YOUR PERSONAL DATA?

The fundamental legal basis for processing personal data is the presence of the data owner's consent. This consent requirement is also legally preserved as per Article 20 of the Constitution of the Turkish Republic. However, Article 5 of the Personal Data Protection Law No. 6698 also stipulates that personal data may be processed without the need for the data owner's consent under certain specific conditions. A primary exception is when data processing is explicitly stipulated in the relevant laws. In this context, with other details to be provided below separately, we process your personal data in line with the following legal reasons which are stipulated particularly in Turkish Commercial Law No. 6102, Turkish Law of Obligations No. 6098, Tax Procedure Law No. 213, Capital Market Law No. 6362, Labor Law No. 4857 and Occupational Health and Safety Law No. 6331, as well as Article 5 of Personal Data Protection Law.

Legal Basis for Processing	Examples
Based on your explicit consent in case no valid legal basis exists to remove the explicit consent requirement as per PDPL and other regulations	Usage of visual records taken during marketing activities, commercial electronic messages, and events
Processing activity to be explicitly stipulated in the relevant law,	Having the relevant person's name on the invoice as per Article 230 of Tax Procedure Law; Health report issuance during recruitment and employment as per Occupational Health and Safety Law; Preparation of general assembly list of attendance as per Turkish Commercial Law and Capital Market Law
In case of requirement of protecting any person's vital interests or in case of actual impossibility	Providing health information if any or blood type of the relevant person in case of an occupational accident involving an employee or supplier or during a natural person's visit to our Company regardless of the name under which they come or in case our Company's employees or managers faint from something
In case of a contract execution or execution of obligations arising out of a present contract	Processing bank account details with the purpose of purchase and sales of products and services and with the purpose of paying personnel salaries,
Requirement of processing with the purpose of establishing, claiming, and protecting a right for Sarkuysan	Filing of a lawsuit, commencing execution proceedings in case of a dispute or conflict with our customers or employees; keeping and submitting documents with evidential value,
Fulfilling a legal obligation as per the regulations	Submitting documents to the relevant {

our Company is obliged to conform

authorities which are required by public institutions, and which may include personal data; writing carrier - receiver details on dispatch notes; processing execution documents sent by debt enforcement offices,

In case your personal data was made public by yourself

Using your personal data which was made public by yourself when you send us email for us to communicate with you, when employee candidates enter their contact details on the website which collects job applications or through social media channels, your visit to our website

In case our legitimate interests require processing, providing that processing does not harm your fundamental rights and freedoms

Providing security for our Company's communication networks and information, conducting our Company's activities, identifying suspicious transactions, and conducting investigations with the purpose of conformity to our risk rules, using storage, hosting, maintenance, and support services in order to provide IT services related to technical and security issues, using cloud technologies with the purpose of providing efficiency for our Company's activities and benefiting from technological means

You can always withdraw your consent in cases where your personal data is being processed through explicit consent. To do this, you must fill out the relevant form and submit it to our Company as part of Right to Information, details of which are to be provided in the following sections. It is crucial to state that you will be removed from the services that require processing based on the explicit consent in question and you may not benefit from certain advantages as of the related date if you withdraw your consent.

8. WHEN AND WITH WHOM WE SHARE YOUR PERSONAL DATA?

The fundamental legal basis for transfer of personal data is consent of relevant data owner for this transfer as it was for processing activity.

However, there are certain conditions under which consent is not required for data transfer as stipulated by the Law. Legal reasons included in the previous section which present exceptions to consent requirement in personal data processing also remove the requirement for obtaining consent for data transfer as well.

As you may recall, our Company may transfer your personal data without needing your consent in case: data transfer is explicitly stipulated in the laws; an actual impossibility exists in obtaining consent for data transfer and data transfer is necessary to protect your health; this data transfer is mandatory according to the legal regulations our Company is obliged to follow; data transfer is mandatory to fulfill obligations of a contract executed between the Company and yourself; data transfer is mandatory in order to establish, claim and protect a right of our Company, our Company has a legitimate interest in data transfer that

may be defended before the law.

We share your personal data in line with the following necessary purposes. We pay particular attention not to transfer your personal data except for these purposes. The following transfer reasons are exemplary, and this list is not supposed to be conclusive.

- **Sarkuysan group companies¹:** Your personal data such as name, email address, telephone number may be shared with or accessible to Sarkuysan Elektrolitik Bakır Sanayi ve Ticaret A.Ş. Group companies in Türkiye and foreign countries since we operate under Sarkuysan group companies. This sharing shall only be between the authorized employees at the relevant Sarkuysan group companies. Your consent shall be sought in data transfer and sharing to other countries. Data sharing between Sarkuysan group companies is conducted in a manner that does not include personal data as part of financial reporting related to company activities such as company profitability and efficiency. The Data Sharing Agreement was signed, and the necessary measures were taken in relation to sharing your personal data with Sarkuysan group companies located in Türkiye. In addition, a data sharing agreement stipulated by Personal Data Protection Agency in relation to data transfer to Sarkuysan group companies located in foreign countries was signed with the relevant group companies and the necessary measures were taken.
- **Authorities:** We may share your personal data with the relevant official, judicial, and administrative authorities in cases which laws or provisions of regulations our Company is subject to require this or with the purpose of protecting our Company's rights (e.g. Capital Market Board, tax offices, law enforcement, courts, and execution offices).
- **Private persons:** As per the relevant regulation provisions, personal data may be shared with the purpose of fulfilling contractual obligations or when demanded by private persons authorized to obtain information and document from our Company in a manner that is limited with their demanded purpose (e.g. independent auditing companies, banks, etc.)
- **Service suppliers and business partners:** While carrying out our Company's commercial activities, there may be organizations with which our Company establishes business partnerships with the purposes of sales, promotion, and marketing of our Company's services and after sales support or from which our Company purchases support services during the provision of services in legal or other subjects. As many other businesses, we may cooperate with trustworthy third parties and shared data with these with the purpose of conducting our activities in order to carry out our functions and services in the most efficient way and in accordance with the current technologies as part of some data processing activities such as information and communication technology providers, independent auditing companies, consultancy services providers, legal offices, cargo companies, transportation firms, travel agencies, suppliers, customs companies, insurance companies, banks, education companies, other companies from agricultural industry group, universities, etc. This sharing process is only conducted in a limited manner in line with the purposes of the establishment and execution of business partnerships. The support company we share data with may be based in foreign countries, in this case data sharing shall be conducted in accordance with the provisions related to data transfer to foreign countries as per Articles 8 and 9 of PDPL.
- **Other persons associated with corporate transactions:** We may occasionally share your personal

¹ Sarkuysan group companies include: Sarkuysan Elektrolitik Bakır Sanayi ve Ticaret A.Ş., Demisaş Döküm Emaye Mamülleri Sanayi A.Ş., Sar Makina San. ve Tic. A.Ş., Sarda Dağıtım ve Ticaret Anonim Şirketi, Sark Bulgaria AD, Sark-Wire, Corp.

data in order to carry our corporate transactions such as sales of a business, reorganization, merger, joint venture or other savings of our business, our assets, or our shares (including the ones associated with any kind of nonsolvency or similar processes).

In data transfer to foreign countries, the operation is conducted after obtaining the relevant data owner's consent or presence of regulation related to data protection in the transferred country and signing of a commitment letter by the transferred data controller that states that the necessary security measures will be taken and finally, in line with the permit of Personal Data Protection Agency. No data transfer has been conducted to foreign countries so far without obtaining the consent of the data owner.

9. HOW LONG DO WE STORE YOUR PERSONAL DATA?

We store your personal data only as long as necessary to fulfill the purpose of data collection. We determine these durations specific to each business process individually, and we destruct your personal data in accordance with the PDPL if no other reason exists for us to store your personal data.

We follow the below criteria when determining destruction times for your personal data:

- Duration specified in the legal regulation in line with the relevant data category's processing purpose,
- Generally accepted duration for business practices in the sector of activity of our Company in line with the relevant data category's processing purpose,
- Duration of legal relation established with the relevant person which requires processing of personal data included in the relevant data category,
- Duration during which the relevant data category's processing purpose will be valid for our Company's legitimate interest according to the law and integrity rules,
- Duration during which the risks, costs and responsibilities emerging out of storing of personal data in legal terms depending on the relevant data category's processing purpose,
- Whether the maximum duration to be determined is favorable for keeping the relevant data category correctly and up-to-date, when necessary,
- Duration during which our Company is obliged to store personal data included in the relevant data category as per the legal obligation of our Company,
- Period of limitation determined to claim a certain right connected with the personal data included in the relevant data category by our Company,

Regardless of the above, our Company will continue to process / store the relevant personal data until the dispute is resolved in case there is a dispute – conflict between the relevant data owner and our Company.

10. HOW DO WE PROTECT YOUR PERSONAL DATA?

The necessary administrative and technical measures are taken by our Company in order to protect your personal data, and to prevent illegal access to or processing of your personal data. In addition to technical measures taken with this purpose, confidentiality agreements were signed with the Company personnel, necessary procedures and check points were established, and clarification text and other texts were issued. The necessary audits are conducted or outsourced with the purpose of confirming the adequacy of administrative and technical measures. Shortcomings identified as a result of these audits are being evaluated by our Company through internal processes and the necessary activities are conducted to improve these measures.

Your personal data specified above may be stored in both physical and digital environments by transferring these to physical archives and information systems belonging to our Company and/or our suppliers. Technical and administrative measures taken in order to provide security of personal data are explained in detail below under two headings.

Technical Measures

Generally acknowledged standard technologies and enterprise safety methods, including the standard technology called Secure Socket Layer (SSL), are used in order to protect personal data collected by our Company. We take technical and administrative measures in order to protect your data from risks such as destruction, loss, tampering, illegal disclosure, or illegal access depending on up-to-date status of the technology, the cost of technological application and the quality of data to be protected. As part of this, we sign data protection agreements with service providers or other persons and organizations we transfer data, or we add provisions related to this to the agreements we sign.

Technical measures taken by our Company include: measures taken to provide cyber security in order to prevent security vulnerability; firewall, gateway, removing outdated software, software updates through patching method; access restrictions, authorization hierarchy, password - establishing fitness-for-purpose and limitation in authorization through access authorization and control matrix; strong password utilization, restricting the number of retries for password entry, enabling change of passwords in regular intervals, opening root access and admin authorization only when needed, immediately deleting the account for dismissed employees or limiting access through closing entry ways; utilization of anti-virus and anti-spam software, enabling SSL or more secure channels for the links if personal data will be obtained through employees' different websites and/or mobile application channels; tracking personal data security, regularly recording user transaction moves (such as log records), reporting security issues, creating a reporting procedure to report system and security vulnerabilities or threats that use these, conducting leakage tests; providing security for environments where the data are stored through physical measures, protecting physical environments where personal data are located against external risks (fire, flood, etc.) and controlling entry / exit points to these environments; taking security needs into account when determining needs related to provision of new systems, development of systems or improvement of current systems; backing up data to allow access in cases where data are damaged, destructed, stolen or lost for any reason and providing access to the backed up data only through system administrator; and keeping data set back-ups outside the network.

Administrative Measures

All activities conducted by our Company were analyzed particularly for all business units in detail and a personal data processing inventory was prepared based on the process as a result of this analysis. The risky areas in this inventory are identified and necessary legal and technical measures are continuously taken.

Information security systems related to personal data processing activities conducted by our Company are being monitored through technical systems and legal methods. Policies and procedures related to personal data security are being determined and regular checks are being conducted as part of this.

Our Company may purchase services from external service provider firms in order to meet the need for information technologies. In this case, our Company makes sure that these service providers provide the security measures provided by our Company as a minimum. In line with this purpose, a written agreement is signed with the relevant service provider, and this agreement includes provisions that stipulate obligations for acting in accordance to PDPL and other regulations in conformity to the purpose and extent of data processing specified in the agreement, for being subject to confidentiality obligation

for an indefinite period of time in relation to the personal data processed by them, for immediately notifying our Company in case of any kind of data breach, for conducting or outsourcing the necessary audits on the systems containing personal data, for having the capacity to examine the audit reports and service provider on-site, and for taking the necessary technical and administrative measures for the security of personal data.

Our Company minimizes personal data processed in line with the data minimization principle and it does not collect and process personal data which are not needed, which are outdated, and which do not serve any purpose.

Expert personnel are employed for technical considerations. Employment Contracts to be signed during the recruitment process of our Company's employees include provisions related to confidentiality and data security and employees are required to conform with these provisions. Employees are regularly informed and trained about the law on personal data protection and taking the necessary measures in accordance with this law. The roles and responsibilities of employees are reviewed accordingly, and their job descriptions are updated.

The subject of Personal Data Protection is embraced by senior management as well. As an indication of the importance attached to the subject, a special Committee has been formed and started working (PDP Committee). A management policy regulating the working rules of the PDP Committee of the Company was put into effect to explain the roles of the PDP Committee in detail.

11. HOW DO WE DESTROY YOUR PERSONAL DATA?

When in fact personal data is processed according to the relevant law provisions as per the provisions of Turkish Criminal Law and Personal Data Protection Law, personal data are deleted, destructed, or anonymized by the decision of our Company or in case there is a demand from personal data owner in this line when the reasons requiring processing of personal data lose validity. Accordingly, "Sarkuysan Policy on Storing and Destructing Personal Data" was issued.

Although deletion of the relevant data upon the request of data owner is a legal obligation, it is not possible for our Company to comply with this request in cases where our Company has a right or obligation to store personal data as per the relevant regulation provisions. Deletion and destruction of personal data are carried out through appropriate methods for the location of storage of data. Our Company takes the necessary measures to ensure safe deletion and destruction of personal data not only for the personal data stored by itself, but also by other persons or organizations in case personal data are processed by them on behalf of the Company in a manner that would make recovery of personal data impossible. Anonymization is not a method used by our Company.

Methods for Destruction of Personal Data

Deletion of Personal Data

Our Company may delete personal data processed by itself in accordance with the provisions of law by its own decision in case the reasons for processing become invalid or processing time comes to an end or upon the request of personal data owner. Deletion of personal data is the process of making personal data inaccessible and unusable for the relevant users. Our Company takes all kinds of technical and administrative measures necessary in order to make deleted personal data inaccessible and non-reusable by the relevant users.

Methods for Deletion of Personal Data

Data Recording Media	Deletion Process
Servers	The access authorization of the relevant users is removed by the system administrator
Digital Media	It is made inaccessible and non-reusable for the employees (relevant users) other than database administrator
Physical (Paper) Environment	It is made inaccessible and non-usable for employees other than the unit manager responsible of document archive by drawing, painting, deleting, or blacking out using indelible ink in a manner that makes it illegible for them
Portable Media	Personal data stored in flash-based storing environments are encrypted and stored in safe environments with encryption keys with the only access authorization remaining with system administrator

Destruction of Personal Data

Our Company may destruct personal data processed by itself in accordance with the provisions of law by its own decision in case the reasons for processing become invalid, processing time comes to an end or stipulated time for destruction expired after deletion process or upon the request of personal data owner. Destruction of personal data is the process of making personal data inaccessible, unrecoverable, and unusable by anyone in any way. Our Company takes all kinds of technical and administrative measures necessary for the destruction of personal data.

Data Recording Media	Destruction Methods
Physical Environment	It is destructed in a manner that is irreversible through paper shredders or by other companies providing these services by melting documents
Optical – Magnetic Environment	It is physically destructed by melting, incinerating, or crushing into powder or through similar methods or data on the environment are made illegible through subjecting the magnetic media to high magnetic field by passing it through a special device, randomly rewriting on itself through special software or deleting

12. WHAT ARE YOUR SPECIAL CATEGORIES OF PERSONAL DATA AND HOW WE PROTECT THEM?

A separate policy was issued and put into effect for processing and protecting special categories of personal data.

Article 6 of the Personal Data Protection Law defines special categories of personal data as data related to

race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, clothing, association, foundation or union membership, health, sexual life, biometric and genetic data provided for criminal conviction and security measures. Having a special importance, these data carry the risk of causing victimization or discrimination of people in case they are illegally processed. In line with this purpose, the legal system specifically regulated special categories of personal data and put special protection measures for processing these data.

Our Company informs the relevant data owners when obtaining special categories of personal data in accordance with Article 10 of the Law. Special categories of personal data are processed by taking measures in accordance with PDPL and carrying out the necessary audits or outsourcing these. As a rule, the most fundamental condition of processing special categories of personal data is the explicit consent of the data owner. Our Company enables data owners to declare their explicit consents for a specific subject, based on information and of their own free will.

Our Company obtains explicit consent of the relevant data owners in relation to special categories of personal data processing, especially in data related to health information. However, as per Paragraph 3 of Article 6 of the Law, it is possible to process personal data, even if sensitive, without seeking the explicit consent of the relevant data owner in certain specific situations as mentioned above.

However, personal data concerning health and sexual life may only be processed, without seeking explicit consent of the data subject, by the persons subject to secrecy obligation or competent public institutions and organizations, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning, and management of health-care services as well as their financing. In terms of all the other legal bases, processing sexual life and health related data depends on the explicit consent of the relevant person.

Our Company takes special measures to ensure the security of special categories of personal data. In line with the data minimization principle, special categories of personal data are not collected unless they are required for the business processes, and they are processed only when necessary. In the event of processing special categories of personal data, technical and administrative measures deemed necessary in order to conform with the legal obligations and conform to the measures determined by the PDP Committee are taken.

In line with the above explanations, Sarkuysan, as the data controller, processes your special categories of personal data in categories of religion information (philosophical belief, religion, sect, and other beliefs data category) as these are included in the old identity documents, membership to associations, foundations and unions, health information since these are legally mandatory and criminal conviction and security measures data categories included in criminal record document.

13. WHAT ARE YOUR RIGHTS REGARDING PERSONAL DATA?

As the owner of your personal data, you are entitled to:

- Find out if your personal data has been processed by our Company,
- Request information if your personal data has been processed,
- Learn the purpose of processing your personal data and whether or not they are used in accordance with the purpose,
- Know the third parties nationwide and abroad to which the personal data is transferred,
- Request rectification of the incomplete or inaccurate data, if any, and request notification of the

third parties to whom your personal data have been transferred accordingly,

- Request erasure or destruction of your personal data if the reasons to process do no longer prevail, and request notification of the third parties to whom your personal data have been transferred accordingly,
- Object to an unfavorable outcome due to analyzing the data processed exclusively through automated systems,
- Claim compensation for the damage arising from the unlawful processing of personal data.

You can communicate these claims of yours to our Company without a charge through the method specified below as per Application Notice:

- 1) Fill out the form at www.sarkuysan.com with wet signature and personally submit it to Sarkuysan Elektrolitik Bakır Sanayi ve Ticaret A.Ş Emek Mah. Aşıroğlu Cad. No:147 Darıca/Kocaeli address (we would like to remind you that you will have to submit your ID card as well).
- 2) Fill out the form at www.sarkuysan.com with wet signature and send it through public notary to Sarkuysan Elektrolitik Bakır Sanayi ve Ticaret A.Ş Emek Mah. Aşıroğlu Cad. No:147 Darıca/Kocaeli address.
- 3) Fill out the form at www.sarkuysan.com, sign it with your “secure electronic signature” as part of Electronic Signature Law No. 5070, and send the form to verisorumlusu@sarkuysan.com or sarkuysan@hs01.kep.tr via a registered electronic mail.
- 4) Send your claims in written form via your email address which was previously communicated to our Company, and which is registered in the systems of our Company.

The application shall include the following information:

Name-surname and signature, if the application requires; Turkish ID number, if Turkish citizen; nationality, passport number or ID number, if any, if not a Turkish citizen; residence or workplace address for notification, e-mail address for notification, if any, telephone and fax numbers, subject of request. Information and documents related to the subject shall also be added to the application.

Third parties cannot apply on behalf of the personal data owners. In order for a person other than the personal data owner to be able to apply, there must be a copy of a power of attorney present with wet signature, including public notary’s approval, which is issued by the personal data owner in the name of the person who will apply. In the application you will make to exercise your above mentioned rights which you have as personal data owner and which includes your explanations related to the right you want to exercise; your request should be clear and understandable, the subject of your claim should be related to yourself or you should have specific authorization in this subject in case you are acting on behalf of someone else and your authorization should be documented, the application should include your identity and address information, and documents that confirm your identity should be added to your application.

Your applications as part of this shall be brought to conclusion as soon as possible and maximum within 30 days. The applications in question are free of charge. However, if the action requires an extra cost, fees may be charged in the tariff determined by the Personal Data Protection Board.

Our Company may request additional information from the relevant person in order to confirm whether the applicant is actually the personal data owner. Our Company may ask questions to personal data owner in relation with their applications in order to clarify the considerations found in the application of personal data owner.

As per Article 14 of the PDPL, if the request is refused by our Company, our response is insufficient for you or the request is not responded by our party within the specified time period, you may lodge a

complaint with the Personal Data Protection Board within thirty days as of you get our Company's response, or within sixty days as of the date of the request, in any case.

14. WHAT ARE THE SPECIFIC CONDITIONS UNDER WHICH DATA OWNERS CANNOT CLAIM THEIR RIGHTS?

Personal data owners cannot claim above mentioned rights under the below listed conditions as these are excluded from the extent of PDPL as per Article 28 of PDPL:

- Personal data are processed for official statistics and provided that they are being anonymized for the purposes for such as research, planning, and statistics.
- Personal data are processed with artistic, historical, literary, or scientific purposes, or within the scope of freedom of expression provided that national defense, national security, public security, public order, economic security, right to privacy or personal rights are not violated or the process does not constitute a crime.
- Personal data are processed as part of preventive, protective and intelligence activities carried out by public institutions and organizations duly authorized and assigned by law to maintain national defense, national security, public security, public order, or economic security.
- Personal data are processed by judicial authorities or execution authorities with regard to investigation, prosecution, judicial or execution proceedings.

As per the provisions of article 28/2 of the PDPL; you shall not claim any other rights, except the right to claim compensation for the damage, if:

- processing personal data is required for the prevention of the committing a crime or for the investigation of a crime.
- personal data made public by the personal data owner himself/herself is processed.
- personal data processing is necessary for performance of supervision or regulatory duties and disciplinary investigation and prosecution to be carried out by the assigned and authorized public institutions and organizations and by public professional organizations, in accordance with the power conferred on them by the law.
- personal data processing is required for protection of economic and financial interests of the State related to budget, tax, and financial matters.

15. MISCELLANEOUS

In case there is a discrepancy between PDPL and other relevant regulation provisions and the Policy herein, priority shall be given to PDPL and other relevant regulation provisions.

The Policy prepared by our Company herein was put into effect by the resolution of the Board of Sarkuysan.

We would like to remind you that we may update this notice due to changes that may occur in regulation provisions and our Company's policies in time. We will publish the most up-to-date version of the Notice on our website.