

**İPM ENDÜSTRİYEL MADENCİLİK A.Ş.**  
**PERSONAL DATA PROTECTION AND PROCESSING POLICY**

## PERSONAL DATA PROTECTION AND PROCESSING POLICY

For:

All-natural persons except employees of İPM Endüstriyel Madencilik A.Ş. whose personal data is processed by İPM Endüstriyel Madencilik A.Ş.

Prepared by:

İPM Endüstriyel Madencilik A.Ş.

Approved by:

İPM Endüstriyel Madencilik A.Ş. administrative board.

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## CONTENT

1.	INTRODUCTION .....	<b>Error! Bookmark not defined.</b>
1.1	Introduction.....	<b>Error! Bookmark not defined.</b>
1.2	Aim of the Policy.....	<b>Error! Bookmark not defined.</b>
1.3	Scope of the Policy .....	<b>Error! Bookmark not defined.</b>
1.4	Definitions .....	<b>Error! Bookmark not defined.</b>
1.5	Enforcement of the Policy .....	<b>Error! Bookmark not defined.</b>
2.	PROTECTION OF PERSONAL DATA .....	<b>Error! Bookmark not defined.</b>
2.1	Security of Personal Data .....	<b>Error! Bookmark not defined.</b>
2.2	Supervision .....	<b>Error! Bookmark not defined.</b>
2.3	Privacy .....	<b>Error! Bookmark not defined.</b>
2.4	Unauthorized Disclosure of Personal Data.....	<b>Error! Bookmark not defined.</b>
2.5	Protection of Legal Rights of Data Subjects .....	<b>Error! Bookmark not defined.</b>
2.6	Protection of Sensitive Personal Data .....	<b>Error! Bookmark not defined.</b>
3.	PROCESSING AND TRANSFER OF PERSONAL DATA.....	<b>Error! Bookmark not defined.</b>
3.1	General Principles of Processing and Transfer of Personal Data	<b>Error! Bookmark not defined.</b>
3.1.1	Conforming with the Law and Good Faith.....	<b>Error! Bookmark not defined.</b>
3.1.2	Being Accurate and Up to Date If Necessary .....	- 9 -
3.1.3	Being Processed for Specified, Explicit, and Legitimate Interests	<b>Error! Bookmark not defined.</b>
3.1.4	Being Relevant, Limited and Proportionate to the Purpose for which Data is Processed	<b>Error! Bookmark not defined.</b>
3.1.5	Being Stored Only for the Time Specified in Relevant Legislation or Required for the Processing Purpose.....	<b>Error! Bookmark not defined.</b>
3.2	Conditions of Processing Personal Data.....	<b>Error! Bookmark not defined.</b>
3.2.1	It is expressly permitted by any law .....	<b>Error! Bookmark not defined.</b>

- 3.2.2 It is necessary to protect the life or physical integrity of the data subject or another person where the data subject is physically or legally incapable of giving consent**Error! Bookmark not defined.**
- 3.2.3 It is necessary to process personal data of parties of a contract, provided that the processing is directly related to the execution or performance of the contract**Error! Bookmark not defined.**
- 3.2.4 It is necessary for compliance with a legal obligation which our company is subject to **Error! Bookmark not defined.**
- 3.2.5 The relevant information is manifestly made public by the data subject himself/herself **Error! Bookmark not defined.**
- 3.2.6 It is necessary for the institution, usage, or protection of a right**Error! Bookmark not defined.**
- 3.2.7 It is necessary for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the data subjects are not harmed**Error! Bookmark not defined.**
- 3.3 Conditions of Processing Sensitive Personal Data.....**Error! Bookmark not defined.**
- 3.3.1 It is expressly permitted by any law .....**Error! Bookmark not defined.**
- 3.3.2 Planning and management of health services and financing for public health protection, preventive medicine, medical diagnosis, treatment and care services**Error! Bookmark not defined.**
- 3.4 Conditions of Personal Data Transfer.....**Error! Bookmark not defined.**
- 3.4.1 Conditions of Personal Data Transfer Abroad .....**Error! Bookmark not defined.**
4. PERSONAL DATA CATEGORIES AND DATA SUBJECTS.....**Error! Bookmark not defined.**
- 4.1 Personal Data Categories .....**Error! Bookmark not defined.**
- 4.2 Data Subjects.....**Error! Bookmark not defined.**
5. METHODS OF COLLECTING PERSONAL DATA AND CAUSE OF ACTION ..... **Error! Bookmark not defined.**
- 5.1 Methods of Collecting Personal Data .....**Error! Bookmark not defined.**
- 5.2 Cause of Action.....**Error! Bookmark not defined.**
6. PROCESSING PURPOSES OF PERSONAL DATA.....**Error! Bookmark not defined.**

6.1	Matching Data Subject Groups with the Processing Purposes Related to Personal Data Categories.....	<b>Error! Bookmark not defined.</b>
6.2	<b>Personal Data Processing Activities Performed in Physical Spaces .....</b>	<b>- 21 -</b>
6.3	<b>Personal Data Processing Activities Performed on the Website.....</b>	<b>Error! Bookmark not defined.</b>
6.4	<b>Personal Data Processing Activities Performed Through Communication Channels.....</b>	<b>Error! Bookmark not defined.</b>
7.	<b>TRANSFER PURPOSES OF PERSONAL DATA AND RECIPIENTS .....</b>	<b>Error! Bookmark not defined.</b>
7.1	Transfer Purposes of Personal Data .....	<b>Error! Bookmark not defined.</b>
7.2	Recipients .....	<b>Error! Bookmark not defined.</b>
8.	<b>DESTRUCTION AND STORAGE PERIODS OF PERSONAL DATA.....</b>	<b>Error! Bookmark not defined.</b>
8.1	Destruction of Personal Data .....	<b>Error! Bookmark not defined.</b>
8.2	Storage Periods of Personal Data.....	<b>Error! Bookmark not defined.</b>
9.	<b>INFORMING DATA SUBJECTS AND THEIR RIGHTS UNDER THE LAW OF KVK ..</b>	<b>Error! Bookmark not defined.</b>
9.1	Informing Data Subjects .....	<b>Error! Bookmark not defined.</b>
9.2	Cases in which the Policy and the Law shall not apply wholly or partly.....	<b>Error! Bookmark not defined.</b>
9.3	Rights of Data Subjects under the Law of KVK .....	<b>Error! Bookmark not defined.</b>

## 1. INTRODUCTION

### 1.1 Introduction

İPM Endüstriyel Madencilik A.Ş. ("**Company**") attaches the utmost importance to protecting the fundamental rights and freedoms of persons in the protection and processing of personal data, especially the right to privacy as set out in Article 20 of the Constitution. In this context, it pays attention to protect and process personal data under the Law No. 6698 on Protection of Personal Data ("**Law**" or "**Law of KVK**") and acts with this understanding in all its planning and activities.

Our company does not only evaluate the protection and processing of personal data, which is the basis of the right to privacy, within the scope of compliance with the legislation, but puts the value it gives to persons based on its approach. Acting with this awareness, our company takes all necessary administrative and technical measures for the protection and processing of personal data under the Law

### 1.2 Aim of the Policy

The purpose of the Personal Data Protection and Processing Policy ("**Policy**") is to protect the fundamental rights and freedoms of persons to the maximum extent, especially the right to privacy as set out in Article 20 of the Constitution, in the protection and processing of personal data, which is processed wholly or partly automatic ways under the purpose of the law, or by non-automatic means being part of any data filing system and is to inform the data subjects about the obligations, procedures and principles of our company and under the law. The main goal is to ensure full compliance with the legislation in the protection and processing of personal data performed by our company and to protect the right to privacy and data security right of the data subject.

### 1.3 Scope of the Policy

This policy is prepared for and shall be under the specified persons being a natural person: Potential Employees, Trainees, Authorized Persons of the Company, Shareholders/Partners, Business Partners, Family Members of Employees/Shareholders/Authorized Persons, Subcontractors, Authorized Persons/Employees of Subcontractor, Suppliers, Authorized Persons/Employees of Supplier, Authorized Persons/Employees of Service Provider, Customers, Potential Customers, Authorized Persons/Employees of Customer, Financial Consultant, Visitors, and Third-Parties By publishing this Policy on our website, we inform these data subjects about the Law. This Policy shall not be applied to legal entities in any capacity whatsoever. For employees of our company, the "Personal Data Processing Policy for Employees" shall apply.

This policy shall apply to the above-mentioned persons if their data is processed by our company in a wholly or partly automated way, or in a non-automated way being a part of any data filing system. This

policy shall not be applied if the data is not included in the scope of “Personal Data” or if the personal data processing performed by our company are not covered by the above-mentioned means.

#### 1.4 Definitions

The concepts used in the enforcement of this policy mean the following meanings:

Explicit Consent	Freely given specific and informed consent.
Manifestly Made Public	The concept of manifestly made public in the sense of “making it known to all” is considered as one of the exceptions in Article 5 of the Law No. 6698, “the requirement to obtain the explicit consent of the natural person whose personal data is processed”, which is necessary for the processing of personal data.
Obligation to Inform	The data controller must inform the persons to whom their data may be processed, for which purposes and for which legal reasons, and for which purposes it may be transferred.
Relevant User	The person who processes personal data within the data controller organization or under the authority and instruction received from the data controller, except for the person or unit who is technically responsible for storing, protecting and backing up data.
Destruction	It refers to the deletion, destruction, or anonymization of personal data.
Processing of Personal Data	Any operation which is performed upon personal data such as collection, filing, storage, preservation, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization or blocking its use by wholly or partly automatic means or otherwise than by automatic means which form part of a filing system.
KVK Board	Personal Data Protection Board
Relevant Persons / Data Subjects	It refers to Potential Employees, Trainees, Authorized Persons of the Company, Shareholders/Partners, Business Partners, Family Members of Employees/Authorized Persons/Shareholders, Suppliers, Authorized Persons/Employees of Supplier, Subcontractors, Authorized Persons/Employees of Subcontractor, Authorized Persons/Employees of Service Provider, Customers, Potential Customers, Authorized Persons/Employees of Customer, Financial Consultants, Visitors and Third Parties.
Personal Data	Any information related to an identified or identifiable natural person.
Authority	Personal Data Protection Authority.

Processing Data Automatically	It is a self-performing processing activity performed by processor-owning devices such as computers, phones, watches, without human intervention within the scope of algorithms prepared in advance through software or hardware features.
Sensitive Personal Data	Data related to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of an association, foundation or trade-union, health, sexual life, criminal conviction and security measures, and biometrics and genetics are sensitive personal data.
Registry	Data Controller's Registry
Company	İPM Endüstriyel Madencilik A.Ş.
Data Processor	Natural or legal person who processes personal data based on the authority granted by and on behalf of the data controller.
Filing System	Any recording system through which personal data is processed by structuring according to specific criteria.
Data Categories	It is a class of personal data belonging to a group or groups of people, in which personal data is categorized according to their common characteristics.
Data Subject	A natural person whose personal data is processed.
Data Controller	Natural or legal person who determines the purposes and means of the processing of personal data, and who is responsible for the establishment and management of the filing system.

## 1.5 Enforcement of the Policy

The Policy, which came into force on 27.01.2020 and regulated by İPM Endüstriyel Madencilik A.Ş., is published on the company's website ([www.ipmindustries.com](http://www.ipmindustries.com)) and made available to data subjects.

## 2. PROTECTION OF PERSONAL DATA

### 2.1 Security of Personal Data

Under the Law, our company takes all necessary administrative and technical measures to ensure the appropriate level of security to store personal data securely and to prevent illegal processing and

access to personal data. The administrative and technical measures taken regarding the security of personal data are detailed in the Personal Data Storage and Destruction Policy of our company.

Our company has established the “Personal Data Protection Management System” to ensure compliance with the regulations in the Law and other legislation and it has created Personal Data Protection Committee within its body to ensure the implementation of the policy and other related policies.

## **2.2 Supervision**

Our company conducts the necessary supervision to establish the data security described above and to ensure the regularity and continuity of the measures taken. The Personal Data Protection Committee supervises the measures taken for the security of personal data.

## **2.3 Privacy**

Our company takes all necessary administrative and technical measures according to technological facilities and application costs to ensure that the relevant data controllers and processors do not disclose their data to anyone in violation of the provisions of Law and Policy and do not use it for processing. In this context, information and training activities about the Law and Policy are carried out for the employees of the company, and confidentiality agreements are signed as part of the recruitment processes of the employees.

## **2.4 Unauthorized Disclosure of Personal Data**

If the personal data processed by our company is obtained by others in ways that are not under the law, our company shall take the necessary actions to inform the data subject and the Board within the periods determined by the Board of this situation. If necessary, this shall be announced on the website of the Board or by any other method deemed appropriate by the Board.

## **2.5 Protection of Legal Rights of Data Subjects**

Our company respects and takes all necessary measures to protect the legal rights of data subjects concerning the enforcement of the Policy and the Law.

## **2.6 Protection of Sensitive Personal Data**

Data related to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of an association, foundation or trade-union, health, sexual life, criminal conviction and security measures, and biometrics and genetics are sensitive personal data. Our company is aware of the fact that sensitive personal data is data that, if learned by others, could cause the data subject to be suffered or discriminated, and therefore takes the appropriate measures determined by the Board to protect such personal data, which is processed under the law, with precision. Within this framework, it has a separate policy (Security Policy of Sensitive Personal Data) and a systematic procedure, clearly defined, manageable, and sustainable.

# **3. PROCESSING AND TRANSFER OF PERSONAL DATA**

## **3.1 General Principles of Processing and Transfer of Personal Data**

Personal data is processed by our company under the procedures and principles set out in the Law and this policy. Our company complies with the following principles when processing personal data.

### **3.1.1 Conforming with the Law and Good Faith**

Our company processes and uses personal data under the relevant legislation and the requirements of good faith. Following the principle of conforming with good faith, our Company considers the interests and reasonable expectations of data subjects when trying to achieve its objectives in data processing. It acts in a way that prevents the appearance of results that the data subject does not expect and does not need to expect. Under the principle, it also ensures that the data processing in question is transparent for the data subject and acts under the notifying and warning obligations.

### **3.1.1 Being Accurate and Up to Date if Necessary**

Our company ensures that the personal data it processes is accurate and up-to-date, taking into account the fundamental rights and legitimate interests of data subjects. In this context, it considers carefully the issues such as certainty of sources from which data is obtained, confirmation of its accuracy, evaluation of whether it needs to be updated. Our company keeps channels open to ensure that information on the data subject is accurate and up-to-date at all times under the due diligence. Keeping personal data accurate and up-to-date is essential in protecting the interests of our company as well as in protecting the fundamental rights and freedoms of data subjects.

### **3.1.1 Being Processed for Specified, Explicit, and Legitimate Purposes**

Our company determines the purpose of data processing clearly and precisely and ensures that this purpose is legitimate. If the purpose is legitimate, it means that the personal data our company processes are related to and necessary for the work it has performed or the service it has provided. Our company does not process data for other purposes other than those stated. In this respect, it is sensitive to compliance with the principle of certainty and clarity in legal transactions and texts in which personal data processing purposes are explained.

### **3.1.2 Being Relevant, Limited and Proportionate to the Purposes for which Data is Processed**

Our company considers the personal data processed to be convenient for the achievement of the stated objectives and avoids the processing of data that is not relevant to the achievement of the purpose or that is not needed. Our company does not collect or process personal data for purposes that do not exist and are considered to occur later. It performs the processing conditions set out in the act as if it is the first time it has started processing data to fulfill the needs that are likely to arise later. It also limits the processed data to only what is needed to achieve the purpose. Within the scope of the principle of proportionality, it creates a reasonable balance between data processing and its intended purpose.

### **3.1.3 Being Stored Only for the Time Specified in Relevant Legislation or Required for Processing Purpose**

Our company complies with these conditions if there is a period stipulated in the relevant legislation to store the data; otherwise, it shall only store the personal data for the period required for the purpose for which it is processed. In the absence of a valid reason for further storage of personal data by our company, such data is deleted, destroyed or anonymized. The procedures for storing and destroying personal data are detailed in the Personal Data Storage and Destruction Policy of our company.

## **3.2 Conditions of Processing Personal Data**

Our company does not process personal data without the explicit consent of the data subject. Personal data may only be processed in the event of one of the following conditions without the explicit consent of the data subject:

### **3.2.1 It is expressly permitted by any law**

Our company may process personal data without seeking the explicit consent of the data subject, as expressly permitted by any law.

**3.2.2 It is necessary to protect the life or physical integrity of the data subject or another person where the data subject is physically or legally incapable of giving consent**

Our company may process personal data without seeking explicit consent to protect the life or physical integrity of data subjects where they are physically or legally incapable of giving consent.

**3.2.3 It is necessary to process personal data of parties of a contract, provided that the processing is directly related to the execution or performance of the contract**

If the processing of personal data of the parties of a contract is necessary directly related to the execution or performance of a contract, as a natural flow of life, our company may process personal data of data subjects without explicit consent, limited to this purpose.

**3.2.4 It is necessary for compliance with a legal obligation which our company is subject to**

Our company may process the personal data of the data subject without seeking explicit consent when it is necessary to fulfill its legal obligations as a data controller.

**3.2.5 The relevant information is manifestly made public by the data subject herself/himself**

Our company may process the personal data of data subjects, which is manifestly made public by them, in other words, revealed to the public in any way, only for this purpose (manifestly made public) in case it is accepted that the legal interest which should be protected in the processing of such data, which is manifestly made public by data subjects and thus becomes known to all, has been eliminated.

**3.2.6 It is necessary for the institution, usage, or protection of a right**

Our company may process the personal data of data subjects without explicit consent where it is legally necessary to process data for the usage or protection of a legitimate right.

**3.2.7 It is necessary for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the data subject are not harmed**

Our company may process the personal data of data subjects in cases where the processing of personal data is necessary to ensure the legitimate interests of the data controller, without harming the fundamental rights and freedoms protected under the Law and Policy. Our company is sensitive to comply with the basic principles regarding the protection of personal data and to observe the balance of interests between our company and data subjects. Legitimate interest is an effective, specific, and already existing one that can compete with the fundamental rights and freedom of the data subject. Our company takes additional protective measures to prevent damage to the rights of the data subject. A reasonable balance is achieved between the interests of our company and the fundamental rights and freedoms of the data subject.

**3.3 Conditions of Processing Sensitive Personal Data**

Our Company does not process sensitive personal data without the explicit consent of the data subject. Sensitive personal data may only be processed in the event of one of the following conditions without the explicit consent of the data subject:

**3.3.1 It is expressly permitted by any law**

Sensitive personal data other than the health and sexual life of the data subject may be processed without the explicit consent of the data subject, where it is expressly permitted by law.

### **3.3.2 Planning and management of health services and financing for public health protection, preventive medicine, medical diagnosis, treatment, and care services**

Sensitive personal data related to the health and sexual life of the data subject may be processed by persons under the obligation to keep secrets or by authorized institutions and organizations, for public health protection, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

### **3.4 Conditions of Personal Data Transfer**

Our company may transfer personal data to third parties based on one or more of the following personal data processing conditions under Article 8 of the Law by taking the necessary security measures:

- The explicit consent of the data subject,
- A clear regulation regarding the transfer of personal data in the law,
- Personal data transfer is necessary for the protection of the life or physical integrity of the data subject or anyone else, and when the data subject is physically or legally incapable of giving consent, or his/her consent is not granted legal validity,
- It is necessary to transfer personal data of parties of a contract, provided that it is directly related to the execution or performance of the contract,
- It is necessary to transfer personal data for our company to fulfill its legal obligation,
- The relevant information manifestly made public by the data subject herself/himself,
- It is necessary to transfer personal data for the institution, usage, or protection of a right,
- It is necessary to transfer personal data for the legitimate interests of our company, provided that the fundamental rights and freedoms of the data subject are not harmed.

Sensitive personal data may be transferred based on one of the following conditions and provided that adequate measures are taken on a limited basis:

- The explicit consent of the data subject,
- A clear regulation in the Law regarding the transfer of sensitive personal data of the data subject other than the health and sexual life,
- Sensitive personal data related to the health and sexual life of the data subject may be transferred by persons under the obligation to keep secrets or by authorized institutions and organizations, for public health protection, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

#### **3.4.1 Conditions of Personal Data Transfer Abroad**

Our company may transfer personal data abroad with the explicit consent of the data subject under Article 9 of the Law by taking the necessary security measures.

Besides, in case of the existence of one of the conditions specified in Article 5(2) and Article 6(3) of the Law, our company may transfer personal data without the explicit consent of the data subject only to foreign countries declared to have adequate protection by the Board or in the absence of adequate protection, to foreign countries where data controllers in Turkey and the relevant foreign country undertake adequate protection in written and have the permission of the Board without prejudice to the provisions of the International Convention to which Turkey is a party.

## **4. PERSONAL DATA CATEGORIES AND DATA SUBJECTS**

#### 4.1 Personal Data Categories

Personal data is processed by our company by categorized as follows:

Identity	Data containing information about the identity of the data subject: first name, last name, ID number, marital status, parents names, place and date of birth, and other identifying information including driving license, ID card and passport copies, tax number, social security number, signature, etc.
Communication	Contact details of data subjects: phone number, address, e-mail address, registered e-mail address, fax number, etc.
Personnel Information	Information processed to obtain information that will be fundamental to the protection of personal rights of data subjects: CV, title, certificate of employment/termination, social security/retirement, payroll, declaration of property, disciplinary proceeding, and performance evaluation reports, etc.
Location	Information about the location of data subjects: Location information obtained when using vehicles or devices belong to Company and group companies; location data obtained from systems such as OGS (automatic toll collection system), vehicle identification and meal cards, etc.
Legal Process	Data processed within the scope of determination of the company's legal claims and rights, prosecution, and performance of its debts and legal obligations: the power of attorney, court and administrative authority decisions, correspondences with judicial authorities, case files, etc.
Safety of Physical Space	Personal data related to records and documents obtained when entering and inside physical spaces of the company: Entrance-exit records, magnetic card records, security camera records, license plates, etc.
Process Security	Personal data related to administrative, legal, and commercial security of data subject and the company while the company activities are performed: IP address, website traffic information, website access records, codes and passwords, etc.
Finance	Personal data processed related to information, documents, and records showing the results of any financial relationship the company has established with data subjects and information related to a bank account, credit, balance sheet, financial profile, assets and insurance, etc.
Professional Experience	Information related to degree, transcript, education/course/certificate, driving license, foreign language, reference, etc. recorded during and after recruitment of data subjects.
Visual and Auditory Records	Photographs, camera, and voice records that can be received except the safety of physical space of data subjects, as well as other documents in which this data is transferred: photographs attached to documents, video interviews and meeting records, etc.
Correspondence	Information obtained from the company's communication and information systems: Corporate phone call records, registered mail and e-mail records and contents etc.

Customer Operation	Information related to natural persons within the scope of commercial activities: Customer number; order, request and instructions; call center records; invoice, note, check; box office receipts etc.
Risk Management	Information related to the notifications of event/danger/risk processed to protect the reputation of the company and financial order.
<b>SENSITIVE PERSONAL DATA</b>	
Health	Health information related to data subjects: examination information, bill of health, disability status, health permits, blood group etc.
Criminal Conviction and Security Measures	Documents related to information on criminal conviction and security measures decisions about data subjects: criminal records.
Association Membership	Information related to the association membership of data subjects
Biometric Data	Biometric data related to data subjects: fingerprints, face, eye recognition, etc.

## 4.2 Data Subjects

Only natural persons may benefit from the protection of this Policy and the Law. Data subjects in this scope are categorized as follows:

Potential Employee	Natural persons who have applied to our company in any way or who have opened their CV and related information to our company's review.
Trainee	Natural persons who learn their job by practicing in our company to improve their professional knowledge and gain experience.
Shareholder	Persons who are shareholders of İPM Endüstriyel Madencilik A.Ş.
Authorized Person of the Company	Authorized persons of İPM Endüstriyel Madencilik A.Ş.

Business Partner	Natural persons or legal persons not involved in categories such as Participants, Subcontractors and Suppliers and are independent of our company with whom our company has a business relationship.
Customer	Natural persons or legal persons such as dealers, distributors, sales points who deliver our company's products to the end consumer within the scope of the contractual relationship.
Authorized Person of Customer	Authorities of natural persons or legal persons such as dealers, distributors, sales points who deliver our company's products to the end consumer within the scope of the contractual relationship.
Employee of Customer	An identified or identifiable employee of natural persons or legal persons such as dealers, distributors, sales points who deliver our company's products to the end consumer within the scope of the contractual relationship.
Potential Customer	Natural persons who have requested or are interested in using our products and services, or who have been assessed by the custom of trade and good faith for which they may have such interest.
Service Provider	Natural persons or legal persons not involved in categories such as Customer, Subcontractor and Supplier and are independent of our company with whom our company has a business relationship.
Authorized Person of Service Provider	Authorized persons of natural persons or legal persons not involved in categories such as Customer, Subcontractor and Supplier and are independent of our company with whom our company has a business relationship.
Employee of Service Provider	Employees of natural persons or legal persons not involved in categories such as Customer, Subcontractor and Supplier and are independent of our company with whom our company has a business relationship.
Subcontractor	Natural persons or legal persons with whom our company has established a relationship between the primary employer and the sub-contractor through a contract.
Authorized Person of Subcontractor	Authorities of natural persons or legal persons with whom our company has established a relationship between the primary employer and the sub-contractor through a contract.
Employee of Subcontractor	An identified/identifiable employee of natural persons or legal persons with whom our company has established a relationship between the primary employer and the sub-contractor through a contract.
Supplier	Natural persons or legal persons who provide input, raw materials or products to our company to provide a product or service.

Authorized Person of Supplier	Authorities of natural persons or legal persons who provide input, raw materials or products to our company to provide a product or service.
Employee of Supplier	An identified/identifiable employees of natural persons or legal persons who provide input, raw materials or products to our company to provide a product or service.
Family Members of Employee/Authorized Person/Shareholder	Family members of Employee/Authorized Person/Shareholder of İPM Endüstriyel Madencilik A.Ş.
Financial Consultant	Natural person who organizes, analyzes the account information of our company, and makes entries in assets, liabilities, and capital accounts.
Third Parties	Other persons who are not covered by İPM Endüstriyel Madencilik A.Ş. Personal Data Protection and Processing Policy for Employees, which is prepared for company employees and by any other data subject groups in this Policy.
Visitor	All-natural persons who have entered the physical spaces owned by our company for various purposes or who have visited our websites for any purpose.

## 5. METHOD OF COLLECTING PERSONAL DATA AND CAUSE OF ACTION

### 5.1 Method of Collecting Personal Data

Our company collects personal data for the purposes specified in Article 6.1 wholly or partly by automatic or non-automatic means; in all kinds of oral, written, electronic media; through, but not limited to, the following channels:

- Job application forms,
- Personnel information forms,
- Various documents submitted to the company,
- Mails, e-mails and forms sent to the company,
- Websites,
- Intranet(Portal),
- PDKS,
- Sodexo,
- Computer,
- Photograph,
- Arvento,
- Phone,
- Verbal communication,
- ERP,
- Security cameras,
- Persons working in the other departments, group companies, third parties and data subjects.

### 5.2 Cause of Action

Our company collects personal data under Articles 5 and 6 of the Law for one of the following cause of actions:

- Explicit consent of the data subject,
- It is expressly permitted by any law,
- Related information is manifestly made public by the data subject herself/himself,
- It is necessary to process personal data of parties of a contract, provided that the processing is directly related to the execution or performance of the contract
- It is necessary to process personal data for our company to fulfill its legal obligation,
- It is necessary to process personal data for the institution, usage, or protection of a right,
- It is necessary to process personal data for the legitimate interests of our company, provided that the fundamental rights and freedoms of the data subject are not harmed.

## **6. PROCESSING PURPOSES OF PERSONAL DATA**

### **6.1 Matching Data Subject Groups with the Processing Purposes Related to Personal Data Categories**

Matching data subject groups described above with their processing purposes for personal data categories are provided below: (Natural persons can only be involved in one group.)

- **Potential Employee**

*Data Categories:* Identity, Communication, Personnel Information, Professional Experience, Visual and Auditory Records, Safety of Physical Space, Association Membership, Health, Criminal Conviction and Security Measures

*Processing Purposes:* Conducting Emergency Activities, Managing the Selection and Recruitment of Potential Employee/Trainee, Managing the Application Processes of Potential Employees, Conducting Audit / Ethical Activities, Conducting Activities under the Legislation, Ensuring Security of Physical Space, Managing and Pursuing Legal Affairs, Conducting/Supervising Business Activities, Conducting Occupational Health / Safety Activities

- **Trainee**

*Data Categories:* Identity, Communication, Safety of Physical Space

*Processing Purposes:* Conducting Emergency Activities, Conducting Activities under the Legislation, Conducting Occupational Health / Safety Activities, Conducting/Supervising Business Activities, Ensuring Security of Physical Space, Conducting Audit / Ethical Activities

- **Shareholder**

*Data Categories:* Identity, Communication, Location, Personnel Information, Finance, Visual and Auditory Records, Safety of Physical Space

*Processing Purposes:* Conducting Emergency Activities, Fulfilling Obligations Arising from Employment Contract and Legislation for Employees, Conducting Audit / Ethical Activities, Conducting Activities under the Legislation, Managing Finance and Accounting Process, Ensuring Security of Physical Space, Managing Assignment Process, Managing and Pursuing Legal Affairs, Conducting Communication Activities, Planning Human Resource Process, Conducting/Supervising Business Activities, Managing Contract Process, Conducting Management Activities

- **Authorized Person of the Company**

*Data Categories:* Identity, Communication, Location, Legal Process, Personnel Information, Finance, Professional Experience, Visual and Auditory Records, Health, Criminal Conviction and Security Measures

*Processing Purposes:* Conducting Emergency Activities, Fulfilling Obligations Arising from Employment Contract and Legislation for Employees, Conducting Audit / Ethical Activities, Conducting Activities under the Legislation, Managing Finance, and Accounting Process, Ensuring Security of Physical Space, Managing Assignment Process, Managing and Pursuing Legal Affairs, Conducting Communication Activities, Planning Human Resource Process, Conducting/Supervising Business Activities, Conducting Occupational Health / Safety Activities, Managing Purchase Process of Goods / Services, Managing Organizations and Events, Managing Risk Management Process, Managing Contract Process, Giving Information to Authorized Persons, Institutions and Organizations

- **Business Partner**

*Data Categories:* Identity, Communication, Location, Personnel Information, Professional Experience, Visual and Auditory Records, Health, Criminal Conviction and Security Measures

*Processing Purposes:* Conducting Activities under the Legislation, Managing Contract Process, Conducting/Supervising Business Activities, Managing and Pursuing Legal Affairs, Managing Purchase Process of Goods / Services, Managing Production and Operation Process of Goods / Services, Conducting Audit / Ethical Activities

- **Customer**

*Data Categories:* Identity, Communication

*Processing Purposes:* Conducting Activities under the Legislation, Managing Sale Process of Goods / Services, Managing Marketing/Analysis Process, Managing Marketing Process of Product/Services, Managing Production and Operation Process of Goods / Services, Managing Customer Relationship Management Process, Conducting/Supervising Business Activities, Conducting Communication Activities

- **Authorized Person of Customer**

*Data Categories:* Identity, Communication, Finance, Process Security

*Processing Purposes:* Managing Sale Process of Goods / Services, Managing Contract Process, Conducting Activities under the Legislation, Managing Contract Process, Conducting/Supervising Business Activities, Conducting Communication Activities, Managing Finance and Accounting Process, Managing Production and Operation Process of Goods / Services, Managing Customer Relationship Management Process, Conducting Communication Activities, Managing Marketing Process of Product/Services, Managing Marketing/Analysis Process

- **Employee of Customer**

*Data Categories:* Identity, Communication, Finance

*Processing Purposes:* Managing Sale Process of Goods / Services, Managing Contract Process, Conducting/Supervising Business Activities, Conducting Activities under the Legislation, Managing Finance and Accounting Process, Managing Production and Operation Process of Goods / Services,

Managing Customer Relationship Management Process, Conducting Communication Activities, Managing Marketing Process of Product/Services, Managing Marketing/Analysis Process

- **Potential Customer**

*Data Categories:* Identity, Communication

*Processing Purposes:* Conducting Activities under the Legislation, Managing Sale Process of Goods / Services, Managing Marketing Process of Product/Services, Managing Marketing/Analysis Process, Managing Production and Operation Process of Goods / Services, Managing Customer Relationship Management Process, Conducting/Supervising Business Activities, Conducting Communication Activities

- **Service Provider**

*Data Categories:* Identity, Communication, Finance

*Processing Purposes:* Managing Finance and Accounting Process, Conducting Activities under the Legislation, Managing Contract Process, Conducting/Supervising Business Activities, Managing Production and Operation Process of Goods / Services, Conducting Communication Activities

- **Authorized Person of Service Provider**

*Data Categories:* Identity, Communication, Finance, Professional Experience, Security of Physical Space

*Processing Purposes:* Conducting Emergency Activities, Conducting Audit / Ethical Activities, Conducting Activities under the Legislation, Ensuring Security of Physical Space, Managing Risk Management Process, Managing Contract Process, Conducting/Supervising Business Activities, Conducting Occupational Health / Safety Activities, Conducting Educational Activities, Conducting Management Activities, Managing Production and Operation Process of Goods / Services, Conducting Communication Activities

- **Employee of Service Provider**

*Data Categories:* Identity, Communication, Customer Operation, Professional Experience, Security of Physical Space

*Processing Purposes:* Conducting Emergency Activities, Conducting Activities under the Legislation, Managing Finance and Accounting Process, Conducting/Supervising Business Activities, Conducting Occupational Health / Safety Activities, Managing Risk Management Process, Managing Contract Process

- **Subcontractor**

*Data Categories:* Identity, Communication, Location, Personnel Information, Finance, Professional Experience, Visual and Auditory Records, Safety of Physical Space, Legal Process, Health, Criminal Conviction and Security Measures

*Processing Purposes:* Conducting Emergency Activities, Conducting Audit / Ethical Activities, Conducting Educational Activities, Conducting Activities under the Legislation, Managing Finance, and Accounting Process, Managing Assignment Process, Managing and Pursuing Legal Affairs, Conducting Internal Audit / Investigation / Intelligence Activities, Conducting Communication Activities, Conducting/Supervising Business Activities, Conducting Occupational Health / Safety Activities, Managing Purchase Process of Goods / Services, Managing Production and Operation Process of Goods / Services, Managing Organizations and Events, Managing Contract Process

- **Authorized Person of Subcontractor**

*Data Categories:* Identity, Communication, Location, Professional Experience, Visual and Auditory Records, Health, Criminal Conviction and Security Measures

*Processing Purposes:* Conducting Audit / Ethical Activities, Conducting Activities under the Legislation, Managing Finance and Accounting Process, Managing Assignment Process, Managing and Pursuing Legal Affairs, Conducting/Supervising Business Activities, Conducting Occupational Health / Safety Activities, Managing Purchase Process of Goods / Services, Managing Production and Operation Process of Goods / Services, Managing Contract Process, Conducting Management Activities

- **Employee of Subcontractor**

*Data Categories:* Identity, Communication, Location, Professional Experience, Visual and Auditory Records, Health, Criminal Conviction and Security Measures

*Processing Purposes:* Conducting Emergency Activities, Conducting Audit / Ethical Activities, Conducting Activities under the Legislation, Managing Finance and Accounting Process, Managing Assignment Process, Managing and Pursuing Legal Affairs, Conducting/Supervising Business Activities, Conducting Occupational Health / Safety Activities, Managing Purchase Process of Goods / Services, Managing Production and Operation Process of Goods / Services, Managing Contract Process

- **Supplier**

*Data Categories:* Identity, Communication, Location, Personnel Information, Finance, Professional Experience, Visual and Auditory Records, Health, Criminal Conviction and Security Measures

*Processing Purposes:* Managing Information Security Process, Conducting Audit / Ethical Activities, Conducting Activities under the Legislation, Managing Finance and Accounting Process, Managing and Pursuing Legal Affairs, Conducting Communication Activities, Conducting/Supervising Business Activities, Conducting Occupational Health / Safety Activities, Managing Purchase Process of Goods / Services, Managing Sale Process of Goods / Services, Managing Production and Operation Process of Goods / Services, Managing Contract Process

- **Authorized Person of Supplier**

*Data Categories:* Identity, Communication, Finance

*Processing Purposes:* Conducting Activities under the Legislation, Managing Finance and Accounting Process, Conducting Internal Audit / Investigation / Intelligence Activities, Conducting Communication Activities, Conducting/Supervising Business Activities, Conducting Logistic Activities, Managing Purchase Process of Goods / Services, Managing Sale Process of Goods / Services, Managing After Sales Support Process of Goods / Services, Managing Production and Operation Process of Goods / Services, Managing Customer Relationship Management Process, Managing Contract Process, Ensuring the Security of Movable Property and Sources

- **Employee of Supplier**

*Data Categories:* Identity, Communication, Customer Operation, Finance

*Processing Purpose:* Managing Sale Process of Goods / Services, Managing Contract Process, Conducting/Supervising Business Activities, Conducting Activities under the Legislation, Managing Finance and Accounting Process, Managing Production and Operation Process of Goods / Services, Managing Customer Relationship Management Process

- **Financial Consultant**

*Data Categories:* Identity, Communication, Finance

*Processing Purposes:* Managing Finance and Accounting Process, Conducting Activities under the Legislation, Conducting/Supervising Business Activities, Giving Information to Authorized Persons, Institutions and Organizations

- **Family Members of Employee/Authorized Person/Shareholder**

*Data Categories:* Identity, Finance

*Processing Purposes:* Fulfilling Obligations Arising from Employment Contract and Legislation for Employees, Conducting Activities under the Legislation, Conducting Audit / Ethical Activities, Planning Human Resource Process, Conducting/Supervising Business Activities

- **Visitor**

*Data Categories:* Identity, Communication, Safety of Physical Space

*Processing Purposes:* Conducting Emergency Activities, Conducting Activities under the Legislation, Conducting Occupational Health / Safety Activities, Conducting Audit / Ethical Activities, Ensuring Security of Physical Space, Conducting Audit / Ethical Activities

- **Third Parties**

*Data Categories:* Identity, Communication, Professional Experience

*Processing Purposes:* Conducting Emergency Activities, Conducting/Supervising Business Activities, Conducting Occupational Health / Safety Activities, Managing Information Security Process, Conducting Audit / Ethical Activities, Managing Access Authorization, Conducting Activities under the Legislation

## **6.2 Personal Data Processing Performed in Physical Spaces**

To ensure security in our company's buildings and facilities, entrances and exits are recorded and public areas are monitored with cameras. There is information about this in the areas where the camera is monitored.

Under Law No. 5651 on the Regulation of Internet Publications and Fight against Crimes Committed through These Publications and other legislation, records regarding internet access provided in our company's buildings and facilities are kept. These records may be shared with authorized public

institutions and organizations upon request and may be used for the fulfillment of relevant legal obligations in supervision if necessary.

### **6.3 Personal Data Processing Performed on the Website**

Traffic information of online visitors who visit our website is processed automatically to manage information security processes. On the other hand, under Law No. 5651 and other legislation, hosting providers are obliged to record and store website traffic information.

Detailed descriptions of personal data processed through the website are available on the relevant website.

### **6.4 Personal Data Processing Performed Through Communication**

Communication performed through the channels such as call center, mail, e-mail, etc. are supervised and recorded to conduct/supervise business activities and follow demands/complaints.

Relevant persons are required to use these channels only in the context of their business activities.

## **7. TRANSFER PURPOSES OF PERSONAL DATA AND RECIPIENTS**

### **7.1 Transfer Purposes of Personal Data**

Our company transfers personal data under the conditions set out in Articles 8 and 9 of the Law for the following purposes:

- Conducting Emergency Activities,
- Managing Information Security Process,
- Fulfilling Obligations Arising from Employment Contract and Legislation for Employees,
- Managing Ancillary Rights and Benefits Processes for Employees,
- Conducting Audit / Ethical Activities,
- Conducting Educational Activities,
- Managing Access Authorization,
- Conducting Activities under the Legislation,
- Managing Finance and Accounting Process,
- Ensuring Security of Physical Space,
- Managing Assignment Process,
- Managing and Pursuing Legal Affairs,
- Conducting Internal Audit / Investigation / Intelligence Activities,
- Conducting Communication Activities,
- Conducting/Supervising Business Activities,
- Conducting Occupational Health / Safety Activities
- Conducting Logistic Activities,
- Managing Purchase Process of Goods / Services,
- Managing Sale Process of Goods / Services,
- Managing After Sales Support Process of Goods / Services,
- Managing Production and Operation Process of Goods / Services,
- Managing Customer Relationship Management Process
- Managing Organizations and Events,
- Managing Marketing/Analysis Process

- Managing Risk Management Process
- Managing Contract Process
- Ensuring the Security of Movable Property and Sources
- Managing Marketing Product/Services Process
- Giving Information to Authorized Persons, Institutions and Organizations
- Conducting Management Activities

## **7.2 Recipients**

Our company may transfer personal data to the following persons and organizations, limited to data categories and data required for transfer:

- Natural persons or private legal entities
- Business partners
- Affiliates and subsidiaries
- Suppliers
- Group companies
- Authorized public institutions and organizations

## **8. DESTRUCTION AND STORAGE PERIODS OF PERSONAL DATA**

### **8.1 Destruction of Personal Data**

Without prejudice to the provisions of other laws relating to the destruction of personal data, our company deletes, destroys or anonymizes personal data processed under this Law and other provisions of the Law at the request of the relevant person, according to Personal Data Storage and Destruction Policy, if the reasons for processing are eliminated.

The deletion of personal data refers to the process of making personal data inaccessible and unusable for the users concerned in any way.

Destruction of personal data refers to the process of making personal data inaccessible, irreversible, and non-reusable by anyone.

Anonymization of personal data refers to the process of making personal data impossible to relate to a natural person whose identity is identified or identifiable under any circumstances, even if it is matched with other data by techniques such as masking, variable extraction, generalization, etc.

### **8.2 Storage Periods of Personal Data**

Our company stores personal data following the periods prescribed by the Law and other legislation. If there is no storage period prescribed in the Laws and other legislation, personal data is stored under our company's Personal Data Storage and Destruction Policy for the required time to achieve the purpose of processing that personal data, then it is deleted, destroyed or anonymized within the framework of periodic destruction periods.

## **9. INFORMING DATA SUBJECTS AND THEIR RIGHTS UNDER KVK LAW**

### **9.1 Informing Data Subject**

Under Article 10 of the KVK Law, our company provides information about the persons involved in obtaining personal data. In this context, it clarifies the identity of the company representative, the

purpose for which the personal data will be processed, to whom and for what purpose it may be transferred, the method of collection and cause of action, and the rights of the data subject.

## **9.2 The cases in which the Policy and the Law shall not apply wholly or partly**

The provisions of this Policy and Law shall not apply in the following cases:

- Processing of personal data by natural persons entirely within the scope of activities related to them or their family members living in the same residence, provided that it is not given to third parties and that data security obligations are complied with,
- Processing of personal data for purposes such as research, planning and statistics by anonymized with official statistics,
- Processing of personal data for art, history, literature or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, public order, economic security, right to privacy or personal rights or not constitute a crime,
- Processing of personal data within the scope of preventive, protective and intelligence activities conducted by public institutions and organizations authorized by Law to ensure national defense, national security, public security, public order or economic security,
- Processing of personal data by judicial or executive authorities concerning investigations, prosecutions, trials, or executions.

Under and proportionate to the purpose and basic principles of this Policy and Law, Article 10 regulating the informing obligation of the data controller, Article 11 regulating the rights of the data subject, except the right to claim damages, and Article 16 regulating the obligation to Registry of Data Controllers shall not apply in the following cases:

- It is necessary to process personal data to prevent or investigate a crime,
- Processing of personal data manifestly made public by the data subject,
- It is necessary to process personal data for the supervision or regulation duties and disciplinary investigation or prosecution by the authorized institutions and organizations and professional organizations of the nature of public institutions, based on the authority given by the Law,
- It is necessary to process personal data to protect the economic and financial interests of the Government concerning budget, tax, and fiscal matters.

## **9.3 Rights of the Data Subject under the Law of KVK**

Under Article 10 of the Law, our company informs data subjects about their rights, provides guidance on how to exercise these rights, and performs the necessary internal procedures, administrative and technical arrangements for all these. According to Article 11 of the Law, data subjects have the right to:

- Learn whether their data is processed,
- Request related information if their data is processed,
- Learn the purposes for processing personal data and whether it is used accordingly,
- Know the third parties to whom their data is transferred domestically or abroad,
- Request the rectification of their data if it is processed incompletely or improperly,
- Request the deletion or destruction of personal data under Article 7 of the Law,

- Request the third parties who received personal data of the data subject to be notified about the transactions made (rectification and destruction) under Article 11 (d) and (e) of the Law,
- Object to the outcome against the persons themselves by analyzing the processed data exclusively through automated systems,
- Claim for damages if personal data is damaged due to illegal processing.

Requests and applications related to the enforcement of the Law can be submitted in person or can be sent via Notary to the address “Mistral İş Kulesi Çınarlı Mahallesi Ankara Asfaltı Caddesi No:15 K:32 Konak/İZMİR” by filling the application form on our website ([www.ipmindustries.com](http://www.ipmindustries.com)). They can also be sent via registered e-mail address [ipmendustriyel@hs03.kep.tr](mailto:ipmendustriyel@hs03.kep.tr), or using a secure electronic signature or mobile signature.

Requests and applications can also be sent to the address [info@ipmindustries.com](mailto:info@ipmindustries.com) if there is an e-mail previously notified to our company by the data subject and registered in the company’s system.

The following information is obligatory in requests and applications:

- First name, last name, and signature if the application is in writing,
- Turkish National Identity Number for citizens of the Republic of Turkey, nationality, and passport number (national identification number if applicable) for other nationalities.
- Permanent address or business address based for notifications,
- E-mail address, phone and fax number if applicable to the notification,
- Subject

Information and related documents should be attached to the application.

Our company shall respond to the requests in the application free of charge as soon as possible and within thirty days at the latest, depending on the nature of the request. However; if the transaction requires an additional cost, the fee in the tariff determined by the Board may be charged.

Our company may accept the request or reject it by explaining the reason and informs the data subject in written or electronically. If the request in the application is accepted, our company shall fulfill the requirements as soon as possible and inform the data subject. If the application is caused by the error of our company, the fee shall be refunded to the data subject.

If the application is rejected, the response is insufficient or the application is not responded in due time, the data subject has the right to make a complaint to the Board within thirty days from the date of receipt and, in any case, within sixty days from the date of application.