

CLARIFICATION TEXT IN THE SCOPE OF THE LAW ON CONFIDENTIALITY PROCEDURES AND PROTECTION OF PERSONAL DATA

This Clarification Text, whose details are mentioned below, has been issued within the scope of the liability arising under article 10 of the Law no. 6698 on Protection of Personal Data (LPPD). We announce this informative text and necessary statements to related parties. Our company always reserves the right to make necessary updates in this clarification text within the framework of the law.

Our company is ŞİMŞEK AMBALAJ SAN. VE TİC. A.Ş. and as data controller it attaches importance and respect to the right of privacy and safety, and desires to fulfil its responsibilities under LPPD. Therefore; as the data controller, our company shall explain the purposes for processing your personal data, the methods of data collection and related legal grounds as well as your rights stated in article 11 of LPPD.

We publish this clarification text by addressing to all natural entities that have shared or will share their personal data with us face to face, in distance, orally, in written or by electronic means including but not limited to all our customers, our employees, former employees with terminated contracts, our guests visiting our workplace, our suppliers, people visiting our website, users connecting to visitor-based network of our company, our customers included in database of the company, third parties included in marketing positions in sites such as fairs etc., our consumers filling customer forms over our website, employee candidates sent for reference or filling application form, all our business partners included in our commercial activities and their employees.

1. What are the purposes and legal grounds of processing your personal data?

First of all, we would like to mention that your personal data shall be processed by the COMPANY in line with the explicit consent given by your party as in accordance with the provisions of the Law no. 6698 on Protection of Personal Data. We also would like to remind you that in cases stated in article 5/2 of the Law on Protection of Personal Data, it is not required to obtain explicit consent. The personal data collected by us generally include identification, communication, employment, financial information, visual and audial records, customer transactions data, bank details, address, data provided in employment application form. The personal data collected by us are processed,

- a) In order to provide information requested by authorised public institutions and organisations, and especially if demanded by the Court and authorised public officers,
- b) In order to carry out our legal obligations and enjoy our rights arising from current legislation (personnel file records required under labour contract, health records, obligations under trade and tax laws),
- c) In order to fulfil contractual obligations (delivery of the product manufactured by our company, determination of the person receiving delivery, management of billing processes, commercial activities and risk processes, etc.),

- d) In order to contact with the addressee during management of purchase and sale of goods, to provide feedback for the customer pursuant to the sales contract, and to reply to complaints and recommendations of the customers,
- e) In order to provide employees within the framework of human resources policy and needs of the company, to carry out and develop employment processes, to evaluate and conclude job applications, to contact with candidates making job application, to carry out our human resources policy, to evaluate, improve and enhance such policy and our services,
- f) In order to obtain information about visitors to ensure safety for our workers at workplace,
- g) In order to manage marketing processes, promote products, carry out sector-related activities and to increase turnover in areas such as fair, street fair, etc.
- h) We would like to inform candidate employees about the facts that data provided by candidates sending cv to make job application to our company can be used in order to make assessment for the applied position or potential positions, and such data can be saved within Human Resources data and physical data during related periods of time.
- i) We also would like to mention that personal data, belonging to all our business partners and their employees benefiting from the Law on Protection of Personal Data with relation to our commercial activities, can be processed in order to fulfil contractual obligations during the course of commercial relations and afterwards as customer portfolio of the company.

2. We would like to clarify the parties to whom your personal data shall be transferred and the purposes of such transfer.

First of all, your personal data is safe in our company. We do not share such data with third parties without explicit consent given by you.

However, we have the obligation to share such data with third parties and institutions under the law and the legislation. We take necessary technical, administrative and legal precautions in order to prevent violation of rights during such sharing under the law. We attach importance to privacy even during such transfer.

Again, the personal data provided for our company by your party are transferred to our business partners, service providers, suppliers, group companies, company managers and shareholders, authorised public institutions and organisations and private entities in compliance with the conditions stated in articles 8 and 9 of LPPD.

Moreover; the personal can be transferred by the company to overseas due to above mentioned purposes, if explicit consent of the data owner is available or if one or more of above mentioned conditions are met if there is no such consent, and if there is sufficient protection in the target country, and if there is no sufficient protection in target country, upon written warranty provided by related company together with the data controllers and by acquitting permission of Board on Protection of Personal Data. For instance, personal data can

be shared during hotel booking process to be carried out for a fair organisation to be participated abroad by our personnel as representative of our company, or during management of export and billing processes in your export department. Personal data which are in the regarded as private are not transferred overseas.

3. We would like to clarify the methods of collecting personal data and the legal grounds for such collection.

We process your personal data for above mentioned purposes pursuant to Turkish Code of Obligations no. 6098, Code of Commerce no. 6102, various Tax Legislations, Social Security Legislation, Law no. 6502 on Protection of Consumers, Labour Law no. 4857, Law no. 6563 on Regulating Electronic Trade, Law no. 6331, Customs Law no. 4458 and regulations and communiques issued with relation to such laws, under all other legislations or upon your explicit consent.

Personal data processing refers to every kind of transaction carried out on personal data such as acquisition, recording, collecting, storage, modification, re-arrangement, disclose, transfer, take-over, transformation into accessible form, classification or preventing use of such data by partially or completely automated means or non-automated means on condition of remaining as part of a data recording system.

In our company, personal data can be collected for above mentioned purposes by partially or completely automated means or non-automated means on condition of remaining as part of a data recording system, via company's workplaces, departments and website, by means of cameras and similar tools, orally, in written or by electronic means including but not limited to the followings. For instance,

- a. By means of security cameras at our workplaces,
- b. By audial and visual publications in fairs attended by us for marketing purposes,
- c. Upon contact with supplier's officers or employees during purchase-sale of goods,
- d. In order to have contact during negotiations made to represent your company,
- e. Personal data related to job application are collected by career portals, İŞKUR (Turkish Employment Agency), references and by filling physical application form.

4. We would like to clarify the rights of data owners stated in the law.

You, by applying our company,

- have the right to learn whether your personal data have been processed or not, the purposes of processing and whether such data are used for related purposes, and you can get information about third parties to whom your data have been transferred at home and abroad; you can request information about processed data.

- If wrongful or deficient processing is detected, you may request for correction and notification of such correction process to third parties to whom your personal data have been transferred.
- Moreover; in case of your demand, your personal data shall be deleted, destroyed or become anonymized without any requirement for any justification.
- You also have the right to request for deletion or destruction of your personal data and for notification of such transaction to third parties to whom your personal data have been transferred if reasons for processing no longer exist even though your personal data have been processed in compliance with LPPD and other legal provisions; and to raise an objection to generation of a consequence against the person himself/herself by analysis of processed data exclusively via automated systems.

However, we would like to remind you that personal data, which should be kept by us due to legal obligations and our legal liabilities, shall not be deleted, destroyed or become anonymized.

Under 1st paragraph of article 13 of LPPD, you can send your demand for using above mentioned rights to our company in written or by other means determined by the Board on Protection of Personal Data. Our company shall conclude your application within 30 days at the latest and free of charge (however; if transactions requires an additional cost, a fee can be charged over the tariff determined by the Board) and shall provide you feedback by contact info you have given.

You can contact with us via following communication channels. Please include an email address or mailing address by which we can provide you a written feedback after your application.

Data Controller:

Company: ŞİMŞEK AMBALAJ SAN. VE TİC. A.Ş. Mersis No: 0813004176500001

Address: 10003 Sokak No:1 AOSB ÇİĞLİ / İZMİR

E-Mail : kvkk@simsekambalaj.com.tr Fax: 0232 376 79 43

Kep Address: simsekambalaj@hs01.kep.tr

SAMPLE APPLICATION FORM

Name – Last name of the applicant	
TR ID number	
Telephone number	
E-Mail address	
Address	
Application date	
Please explain in details the subject of your application	
To which address should we send our respond? Mail X Address X	

Name – Last name / signature

You may deliver this application form physically or email it to us. If you shall send it physically, then please write down your name and last name and sign it.