



INDOOR CAMERA SYSTEMS INFORMATION TEXT

KVKK_A3 VERSION 1.00

KARDELEN PAINT AND CHEMICAL INDUSTRY TRADE LIMITED COMPANY

INDOOR CAMERA SYSTEMS LIGHTING REGULATIONS

This Privacy Notice has been prepared in accordance with the Law No. 6698 on the Protection of Personal Data (“Law”) to inform data subjects about the procedures and principles regarding the processing of personal data collected by Kardelen Boya ve Kimya Sanayi Ticaret Limited ħirketi (hereinafter referred to as “the Company”) through closed-circuit recording systems used at its headquarters, locations, and service areas. By entering a facility operated by or served by our company, you acknowledge that your images will be processed by Closed-Circuit Camera Systems (CCTV). This Privacy Notice aims to inform data subjects about who we are as the data controller, which CCTV images we collect and for what purposes, with whom and why we share them, how long we store them, and to provide useful information regarding the collection of your images.

Detailed information regarding the matters included in this Privacy Notice can be accessed from [the Personal Data Protection and Processing Policy](#) and/or our CCTV policy located at <http://www.kardelenboya.com.tr/>.

1. Purpose of Processing Personal Data

Our facilities are monitored daily, both day and night, by Closed-Circuit Television (CCTV) systems. CCTV systems are used at external points within the building (e.g., front entrances, parking lot, etc.) and at specific internal points (e.g., reception area, corridors, etc.). Appropriate warning signs will be posted in areas where CCTV is operating. Image data obtained from CCTV systems is collected and processed within the framework of the personal data processing conditions and purposes specified in Articles 5 and 6 of the Law, for the following purposes: ensuring the legal, technical, and commercial-business security of individuals with whom the Company has a business relationship and ensuring the security of Company locations; preventing criminal acts and anti-social behavior; assisting in the investigation, detection, and prosecution of crimes; controlling ATMs and/or goods receiving areas where cash withdrawals and similar transactions are made; preventing cases of physical violence and/or sexual harassment; ensuring compliance with rules of conduct in work areas; providing a safe environment for personnel and visitors; To verify claims and resolve disputes and legal disagreements regarding incidents occurring in our buildings and facilities (especially where camera footage can help determine the specific circumstances of the incident).

2. Parties to Whom Personal Data May Be Transferred and the Purpose of Transfer

The collected personal data may be shared with legally authorized institutions and organizations upon their request, within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the Law, for the purposes of ensuring the legal, technical and commercial-business security of the relevant individuals with whom the Company has a business relationship and ensuring the security of the Company's locations. In this context, specifically: the technical support team of the indoor camera system supplier, our company's authorized representatives for compliance with workplace conduct rules and the conduct of internal disciplinary investigations, and relevant experts in the field of occupational safety if needed.

Examples include public officials, insurance companies and our company's legal advisors and lawyers for resolving disputes and legal conflicts, and authorized law enforcement units for the prevention, investigation, and prosecution of crimes. For detailed information on who your personal data will be shared with and how, please see our Personal Data Protection Policy at <http://www.kardelenboya.com.tr/> You can check it out at this address.

3. Methods of Collecting Personal Data, Retention Periods, and Our Legal Basis

3.1. Personal data is collected by personnel at the security/information desk located at the building entrance, and additionally, security cameras installed to ensure the security of the building and its surroundings record throughout the day. This information is processed in accordance with Article 5/2/a of the KVKK (Personal Data Protection Law) in cases explicitly provided for in the laws, in accordance with Article 5/2/ç to enable the parties to whom services are provided to fulfill their legal obligations such as the duty of protection and supervision towards their employees, in accordance with Article 5/2/e for the establishment, exercise or protection of a right, and in accordance with Article 5/2/f, when it is necessary for the legitimate interests of the data controller, such as ensuring the security of the institution, its records and its employees, provided that it does not harm the fundamental rights and freedoms of the data subjects.

3.2. Closed-circuit camera system recordings are generally kept for (15) days. In certain circumstances, CCTV recordings may be kept for a longer period, for example:

(a) in cases where a theft or burglary is recorded (in which case the data in question will be preserved and transferred to law enforcement and/or our Company's insurance company and legal advisors)

(b) In case of injury/accident at the workplace (in which case camera recordings can be stored and shared with the relevant insurance company, legal advisors, occupational health and safety expert and authorized public officials;

(c) In the event of a report of a violation that may result in disciplinary action according to workplace rules, the records will be kept for viewing by the authorized representative of the relevant party (with the personal data of third parties redacted where possible).

In addition to the situations exemplified above, camera footage may be retained where there is a legal basis and/or where it is necessary for us to fulfill our legal responsibilities. For more information about retention periods, please visit <http://www.kardelenboya.com.tr/> Personal Data Protection and Processing located at [address]

Please review our policy.

4. Data Subjects' Rights and the Exercise of These Rights

According to Article 11 of the Law, data owners,

- To find out whether your personal data is being processed,
- Requesting information regarding the processing of personal data,
- To learn the purpose of processing personal data and whether it is being used appropriately for that purpose.
- Knowing the third parties to whom personal data is transferred, domestically or internationally (the company never transfers your personal data abroad without your consent),

- The right to request the correction of personal data if it has been processed incompletely or incorrectly, and to request that this correction be notified to third parties to whom the personal data has been transferred.
- The right to request the deletion or destruction of personal data if the reasons requiring its processing have ceased to exist, even if it has been processed in accordance with the law and other relevant legal provisions, and to request that this action be notified to third parties to whom the personal data has been transferred.
- The right to object to an outcome that is detrimental to the individual, resulting solely from the analysis of processed data through automated systems (Our company does not utilize automated decision-making or profiling technologies).
- Individuals have the right to claim compensation for damages incurred as a result of the unlawful processing of their personal data.

You can send your requests and opinions regarding the protection of closed-circuit camera system recordings and other personal data to kvkk@kardelenboya.com.tr.

These rights are exercised by personal data owners [at http://www.kardelenboya.com.tr/](http://www.kardelenboya.com.tr/) If submitted using the methods specified in the Personal Data Protection and Processing Policy located at [address], it will be evaluated and finalized within 30 (thirty) days.

