



Personal Data Protection Law (KVKK) Information

**TEXT**

KVKK\_A4 VERSION 1.00

# KARDELEN PAINT AND CHEMICAL INDUSTRY TRADE LIMITED COMPANY

## Regarding the Processing of Personal Data INFORMATION TEXT

Kardelen Paint and Chemical Industry Trade Limited Company (hereinafter referred to as the "Company") takes utmost care to ensure the security of your personal data.

With this awareness, as a Company, we process all personal data of all individuals associated with the Company, including those who benefit from our products and services, in accordance with the Law No. 6698 on the Protection of Personal Data. We attach great importance to the processing and storage of your personal data in accordance with the Policies and Regulations adopted by the Company (hereinafter referred to as the "KVKK Law" or "Law"). In this context, as the "Data Controller" as defined in the KVKK Law, we process your personal data in the manner explained below and within the limits accepted by the legislation. This Disclosure Statement, in accordance with Article 10 of the Law, primarily aims to:

- a) The identity of the data controller and, if applicable, their representative,
- b) What types of personal data our company collects, and for what purposes your collected personal data is used? that he used it in accordance with that
- c) To whom and for what purpose the processed personal data may be transferred, and,
- d) It explains what your rights are regarding the data processed by the company and how you can exercise these rights.

### 1. DATA CONTROLLER

In accordance with the law, your personal data may be processed by our company, Kardelen Boya ve Kimya Sanayi Ticaret Limited ğirketi ("the Company"), located at Alçy Osb Mah. 2036 Cad. No:7 Sincan/Ankara, Turkey, acting as the data controller, within the scope described below.

### 2. THE PURPOSE FOR WHICH PERSONAL DATA WILL BE PROCESSED

Due to our activities in the areas mentioned in our Articles of Association, primarily the exploration and extraction of crude oil, the collection, evaluation, and availability of information and data necessary for exploration and production; your personal data is collected and processed verbally, in writing, or electronically in accordance with the Regulation on Health and Safety Measures in Working with Chemical Substances and other applicable legislation, the administrative regulations of the Ministry of Labor and Social Security, the Revenue Administration, and other authorized public institutions, as well as the contracts concluded by us. Your collected personal data is used by our relevant departments to carry out the necessary work for relevant stakeholders to benefit from the products and services offered by our Company; and for the legal and security purposes of our Company and those with whom our Company has a business relationship.

Personal data will be processed within the scope of the conditions and purposes of personal data processing specified in Articles 5 and 6 of Law No. 6698, for the purposes of ensuring commercial security (administrative operations related to communication carried out by our Company, ensuring the physical security and control of Company locations, complaint management processes, reputation research processes, event management, legal compliance process, auditing, financial affairs, etc.), determining and implementing our Company's commercial and business strategies, and conducting our commercial activities.

For detailed information on the purposes for which your personal data is processed by our Company, please visit <http://www.kardelenboya.com.tr/> You can find our Company's Personal Data Protection Policy, which has been made public on our website.

### **3. TO WHOM AND FOR WHAT PURPOSE THE PROCESSED PERSONAL DATA MAY BE TRANSFERRED**

Your collected personal data may be shared with our stakeholders, affiliates, directly or indirectly related companies and joint ventures, or public institutions or organizations authorized to request this data due to a legal obligation, and with domestic or foreign institutions, suppliers and business partners with whom we have agreements due to our activities, provided that adequate measures are taken, within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of Law No. 6698, based on your explicit consent or in other cases where data processing is necessary for the legitimate interests of our Company, primarily in accordance with the legislation we are subject to, provided that it does not harm the fundamental rights and freedoms of the data subject, for the purposes of enabling our business units to carry out the necessary work for the benefit of the relevant parties from the products and services offered by our Company, ensuring the implementation of our Company's human resources policies, ensuring the legal and commercial security of our Company and those with whom our Company has a business relationship, and determining and implementing our Company's commercial and business strategies. For detailed information about our Company's partners and affiliates, please visit <http://www.kardelenboya.com.tr/> You can visit this address.

### **4. Method and Legal Basis for Personal Data Collection**

Your personal data is collected through technical and procedural methods carried out in various channels such as the website, all kinds of verbal, written and electronic media and physical channels; in line with the purposes stated above, in order to provide the products and services we offer to the Company within the determined legal framework and to carry out our commercial activities within this framework, based on the relevant legislation, contracts, requests, commercial customs and rules of honesty. Your personal data collected for this legal reason may be processed and transferred within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of Law No. 6698 and for the purposes stated in Articles (2) and (3) of this Disclosure Statement.

### **5. RIGHTS OF PERSONAL DATA SUBJECTS**

In accordance with Article 11 of Law No. 6698, personal data owners may request the implementation of the following rights from our Company:

**a. Right to Information:** You have the right to learn whether your personal data is being processed by our Company, and if so, to request information about the types of data being processed, as well as the purpose of the processing of your personal data and whether it is being used appropriately for that purpose.

**b. Right to Correction:** You may request the immediate correction of any inaccurate data processed by our company concerning you. Taking into account the purpose of data processing, you may also request the completion of any incomplete data.

**c. The right to object to adverse consequences arising from the processing of personal data through automated systems.**

**c. Right to Erasure (Right to be Forgotten):** You may request the immediate deletion of your collected personal data under the conditions stipulated in Article 7 of the Law if: the personal data is no longer necessary in relation to the purposes for which it was collected or processed; you withdraw your consent on which the processing activity is based and there is no other legal basis for the processing activity; you object to the processing activity and there is no overriding legitimate reason for the processing activity as foreseen in the legislation; the personal data has been processed unlawfully; or the deletion of personal data is necessary to ensure compliance with a legal obligation to which our Company is subject.

**d. Right to Request Restriction of Data Processing**

You may request that our company restrict the processing of your personal data if any of the following conditions apply:

(1) In the event that the data subject objects to the accuracy of the personal data, the controller shall have a period of time during which the controller can verify the accuracy of the personal data;

(2) the processing activity is unlawful and the data subject objects to the deletion of personal data and requests instead that the use of the data be restricted;

(2) Our company no longer needs personal data for its processing purposes, but the data owner needs such data for the purpose of making, enforcing or defending legal claims;

(4) Until it is confirmed whether the legitimate grounds of our company outweigh the legitimate grounds of the data owner, the data owner may object to the processing activity in accordance with Article 11 of the Law.

**e. The Right to Data Portability**

You have the right to access the personal data we collect and process about you in a structured, updated, and machine-readable format. You may also request the transfer of such data to another data controller without hindrance, or, if technically possible, request that the transfer be carried out directly by us. Data processing activities may be carried out with your consent or as required by contract.

The transfer will be completed if the process is carried out using automated methods.  
However, this rule does not apply only to data stored on paper.

#### **f. Right of Withdrawal After Consent**

You can always withdraw your consent if the data processing activity was carried out solely with your consent.  
However, in this case, the legitimacy of the data processing activities carried out until the time you withdraw your consent will not be compromised.

#### **g. Right to File a Complaint**

If you wish to file a complaint or believe that our Company has not adequately handled your requests regarding your personal data, you may apply to the Personal Data Protection Board, established under the Law No. 6698 on the Protection of Personal Data. For detailed information on exercising your right to complain, please click on the following link: <https://www.kvkk.gov.tr/Icerik/2063/Sikayet-Hakki>

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In accordance with Article 11 of the Personal Data Protection Law, you can submit your requests regarding the subject matter by sending an email to the registered electronic mail (KEP) address "kvkk@kardelenboya.com.tr", using a secure electronic signature, mobile signature, or the email address you have shared with us and which is registered in our systems, or by submitting a written application to the address "Alc Osb Mah. 2036 Cad. No:7 Sincan/Ankara, Turkey", or by visiting <http://www.kardelenboya.com.tr/> or you submit your applications to us using the methods specified in the Data Subject Application Form located at [address], your applications will be evaluated and finalized as soon as possible, and no later than 30 (thirty) days. While no fee is generally charged for requests, if the process requires additional costs for the Company, a fee may be charged as determined in the Communiqu on the Procedures and Principles Regarding Data Controller Applications.

The company may request information from the applicant to determine whether they are the data subject and may ask the data subject questions regarding their application to clarify the points mentioned in the application.

To exercise your rights mentioned above, please submit your request via the Data Subject Application Form, including the necessary information to prove your identity and a statement regarding the right you wish to exercise, specifying which right your request relates to. This will allow us to process your request more quickly and effectively.