



CLOSED-CIRCUIT CAMERA
PROCEDURES FOR USING THE SYSTEMS
AND ABOUT ITS PRINCIPLES
REGULATIONS

KVKK_Y6 VERSION 1.00

KARDELEN PAINT AND CHEMICAL INDUSTRY TRADE LIMITED COMPANY

USAGE OF CLOSED-CIRCUIT CAMERA SYSTEMS REGULATIONS ON PROCEDURES AND PRINCIPLES

1. INTRODUCTION

- 1.1. The purpose of this Regulation is to regulate the administration, operation, and usage procedures and principles of closed-circuit camera systems used in our buildings and facilities. The aim is to utilize camera recordings to detect actual, anticipated, or perceived criminal activities or other negative events such as accidents in the buildings, parking lots, and other public areas served by our company, to ensure building and facility security, and to protect the health and safety of our employees, visitors, and personnel of service providers.
- 1.2. CCTV monitoring and recording systems will be installed at designated points in buildings and facilities after obtaining the supervision and approval of the Security Guard.
- 1.3. To protect individuals' right to privacy, care will be taken to select the least intrusive areas when determining the locations for the installation of closed-circuit cameras. Cameras placed to record outdoor areas will be positioned in a way that prevents or minimizes the recording of passersby or other individuals' private property.
- 1.4. The camera system will consist of a series of fixed and fully functional (with Pan/Tilt/Zoom capabilities) cameras placed inside the buildings and facilities, as well as in their annexes. Camera images will be monitored by trained and certified security personnel.
- 1.5. The Closed-Circuit Camera System Policy will be published on the company's website, and a copy will be kept readily available within the company for audits conducted by the Personal Data Protection Board.
- 1.6. This Regulation shall be reviewed and updated twice a year, on the first working day of June and November, in consultation with relevant stakeholders if necessary.
- 1.7. The ownership rights of the closed-circuit camera systems shall belong to Kardelen Boya ve Kimya Sanayi Ticaret Limited ŷirketi.

- 1.8. Employees are prohibited from operating camera systems independent of the company's operated closed-circuit camera system, and necessary action will be taken to have them removed if detected.

2. PURPOSE AND SCOPE

2.1. The purposes of this Regulation are as follows:

- a) Protection of property rights of our buildings and facilities
- b) Contributing to ensuring a safe working environment in our buildings and facilities being present.
- c) To assist law enforcement agencies in their investigations and research by providing relevant evidence, thereby supporting efforts to prevent, detect, and investigate crime.

3. CAMERA SYSTEM MANAGEMENT

3.1.1. The closed-circuit camera systems will be managed and directed by the Security Manager in accordance with the provisions of the Company's Closed-Circuit Camera Systems Policy.

3.1.2. The Company Manager will be responsible for security matters during working hours for the daily operation of the system, while the Shift Security Officer, reporting to Management, will be responsible on weekends and during working hours.

3.1.3. All cameras are monitored by the relevant personnel at their respective locations, but only by authorized personnel using Windows DVR monitoring software programs. and can be monitored by the IT Manager when necessary.

3.1.4. Closed-circuit camera systems will be operated to record 24 hours a day, 365 days a year.

3.1.5. If the system requires repair or maintenance outside of working hours, the Shift Security Guard will contact the relevant officer to ensure that the necessary repairs and maintenance are carried out.

3.1.6. Emergency procedures will be followed when emergency services (fire department, medical services, law enforcement, etc.) need to be contacted.

3.1.7. Warning signs indicating that video recording is taking place in the areas covered by the cameras will be placed at appropriate locations at all access points.

3.1.8. Organizing contact meetings with relevant stakeholders regarding technical support of the system.
It can be done.

3.2. System Control and Monitoring Procedures:

The relevant Company Manager will daily check and confirm with the Company's IT Manager whether the cameras are functional and whether the equipment is recording regularly.

3.2.2. Access to the closed-circuit camera system's video recordings is limited to the Company Manager responsible for security matters, the Shift Security Officer, and specifically authorized personnel. Viewing live or pre-recorded footage by unauthorized personnel is strictly prohibited.

3.2.3. Only trained personnel who have been informed about the use of the system and the Closed Circuit Camera Systems Policy will be employed at the security point where video footage is monitored by security personnel.

3.2.4. There must always be at least one Shift Security Supervisor or Officer at the security point. Personnel will be present; otherwise, the security checkpoint will remain locked.

3.2.5. Unless an immediate response to developing events is necessary, it is prohibited to point cameras at an individual, residence, or specific group of people without authorization from the Shift Security Supervisor.

3.2.6. Covert recording with closed-circuit camera systems is prohibited.

3.2.7. Materials and information obtained from the use of closed-circuit camera systems may not be used for commercial purposes under any circumstances.

3.2.8. Records will be kept using digital data recording devices.

3.2.9. Recorded data may only be shared with the media if it is necessary for the investigation of a crime and only with the written permission and instruction of the competent law enforcement unit. Sharing video recordings with any media outlet for any purpose is prohibited, and officials who violate this rule will be subject to disciplinary action in accordance with the relevant articles of the disciplinary regulations.

3.3. Exceptional Circumstances:

3.3.1. The CCTV system is designed to provide maximum usefulness and efficiency.

However, the system is not guaranteed to detect and record every event that occurs within its coverage area.

3.4. Storage and Disposal of Materials:

Data disks will be destroyed using a secure method in accordance with the provisions stated in the Personal Data Storage and Destruction Policy.

The images will be stored on data recorder hard drives for up to 30 days.

Images will only be written to data disks if necessary for the purposes stated in the Closed Circuit Camera Systems Policy, such as the prevention, detection, and investigation of criminal acts.

4.1. PROCEDURES AND PRINCIPLES REGARDING DATA STORAGE

4.1.1. In order to ensure the integrity and protection of the hard disks used by Digital Data Recorders (DVRs) for recording video footage from closed-circuit camera systems, and the areas where they are used, the following procedures and principles shall be observed regarding the storage of camera recording data:

4.1.2. Each DVR recording device will be identified by a unique label or serial number, and the Security Manager will be responsible for monitoring this.

4.1.3. Each DVR recording device will be kept in secure locations where access is restricted to authorized personnel only.

4.1.4. The relevant Company Manager or Shift Security Supervisor will confirm the system's functionality daily in coordination with the IT team.

4.1.5. Disks prepared for use as evidence upon request by authorized persons for purposes such as judicial and disciplinary investigations, occupational health and safety, etc., will be provided only as two CD-R (compact disc) format disks. Each disk in the pair will have the same identification number; one will be the Master Disk (Main Disk) kept by the Company, and the other will be a copy disk delivered to law enforcement or other authorized third parties upon signing a data access request form or a record documenting the matter.

4.1.6. The requested camera recording data and monitoring programs will be loaded onto the relevant disks upon delivery, and the same data will be loaded on both the Master Disk and the Copy Disk.

4.1.7. Each disc will be securely sealed, and the Master Disc will be stored in a secure disc storage cabinet. The duplicate disc will be handed over to the relevant officer after verification of their law enforcement ID card, institutional ID card, photo ID card, or driver's license.

4.1.8. After the registration documents are completed, the Copy Disk will be handed over by the Shift Security Supervisor upon signing of the Delivery and Receipt.

4.2. Handling Formal Requests: Use of closed-circuit camera recordings in judicial investigations.

4.2.1. Closed-circuit camera system recordings may be viewed by law enforcement agencies for the purposes of crime prevention, detection, and investigation; by company management for the performance of supervisory duties; by relevant property owners for use in disciplinary investigations; for permitted presentations and training purposes; and by officials from the Ministry of Finance, the Ministry of Family and Social Policies, the Social Security Institution, etc., to the extent required by their official duties.

4.2.2. The delivery of the data on disk media to the aforementioned officials will be documented, and a logbook will be kept for this purpose.

4.2.3. The review of camera footage by law enforcement units will be recorded in the report included in Appendix 2 and entered into the Daily Incident log by the Shift Security Supervisor.

4.2.4. Upon request for a data disk to be used as evidence, a copy of the disk will be delivered to law enforcement officers in accordance with the procedures specified in Article 4.1.4 of this Regulation. The delivery and receipt of the disks will be carried out in accordance with the Law on Police Duties and Powers (PVSK), Law No. 5188 on Private Security Services, and related regulations and bylaws.

4.2.5. Law enforcement officers may request that the recorded disks be kept safe for future use as evidence. In this case, the disks in question will be properly indexed and kept safe by the Security Shift Supervisor to be presented to law enforcement officers upon request.

4.2.7. Requests for video recordings from third parties, such as complainants' representatives or lawyers, will be forwarded to the Shift Security Supervisor. In these cases, the discs will be provided only if sufficient documentation is presented demonstrating that they are necessary for resolving legal disputes or pursuant to a court order. A reasonable fee may be charged for such requests.

5. VIOLATION OF REGULATION PROVISIONS (INCLUDING SECURITY BREACHES)

5.1. In cases of violation of the provisions of this Regulation by the Shift Security Supervisor or security personnel, the necessary disciplinary investigation processes will be initiated by the Head Security Supervisor or the relevant Company Manager.

5.2. In the event of a serious breach of the provisions of this Regulation, an investigation will be initiated immediately, and an independent investigation may be conducted to remedy the breach.

6. INSPECTIONS AND EVALUATIONS

6.1. Monitoring of the system's operation and performance, including unannounced inspections, will be carried out by the Chief Security Officer or an assistant designated by him/her.

7. COMPLAINTS

7.1. All complaints regarding the operation of closed-circuit camera systems used in our buildings and facilities will be forwarded to the relevant Company Manager.

7.2. Complaints will be investigated promptly in accordance with the matters mentioned in Section 5 of this Regulation.

8. REQUESTS OF DATA SUBJECTS

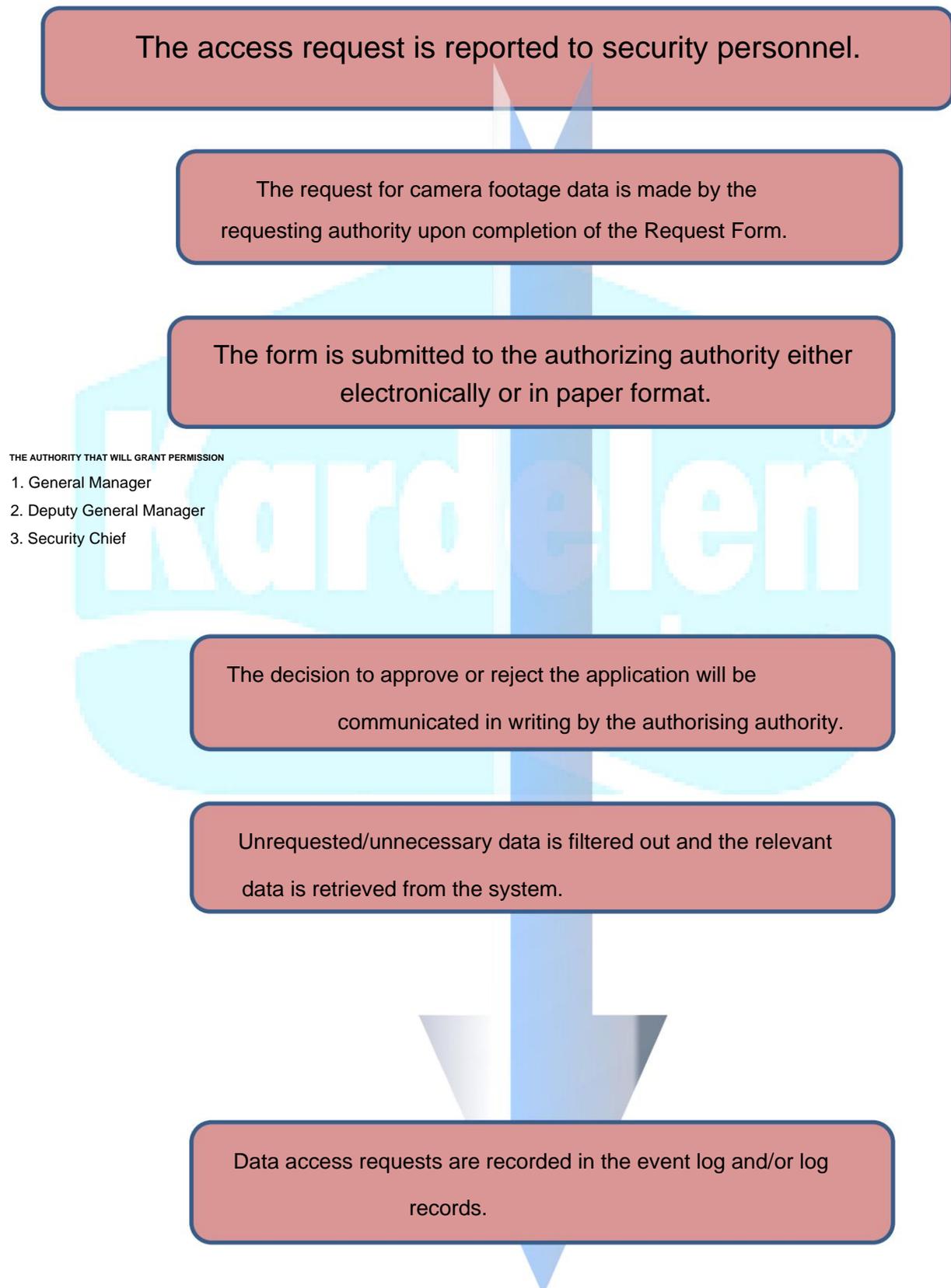
8.1. The Law No. 6698 on the Protection of Personal Data grants individuals the right to access personal data collected about them, including image data from closed-circuit camera systems.

8.2. The aforementioned requests from data subjects will be forwarded without delay to the Company's Data Protection Liaison Officer.



ACCESSING CAMERA RECORDING DATA

PROCESS FLOW REGARDING THEIR REQUESTS



**KARDELEN PAINT CLOSED-CIRCUIT CAMERA SYSTEM IMAGE DATA
ACCESS REQUEST FORM**

This form is used to request access to CCTV footage recorded at Kardelen Boya facilities and its annexes, for the purpose of identifying victims, witnesses, or perpetrators, if any, in relation to a specific criminal investigation. This request is made by the data subject and/or law enforcement officer whose images are being processed.

This form cannot be used by data subjects for requests such as access to, correction of, or cessation of data processing related to their personal data, as per the Law No. 6698 on the Protection of Personal Data. For such requests, the AM Data Subject Application Form must be completed.

Section to be filled out by the party requesting access.

History	
Requesting Officer	
institution	
Reason for the Request	
Crimes/Investigation Number	

Section to be filled out by the Paint Technician at Kardelen

Reasons for allowing access to data	
Reasons for denying a data access request.	
Name and Signature	
Duty	
History	