1. Purpose and Scope

Emas Demir Celik San. ve Dis Tic. Ltd. Sti., within the framework of the Personal Data Protection and Processing Policy ("Policy"), the principles embraced in the conduct of personal data processing activities performed by the Company are explained.

With the policy, "the sustainability of the principle of conducting company activities in transparency" of Emas Demir Celik San. ve Dis Tic. Ltd. Sti., is aimed. In this context, the essential principles adopted in terms of compliance of the Company's data processing activities with the regulations in the Law No. 6698 on the Personal Data Protection Law ("PDPL") are determined and the practices implemented by the Company are explained.

Although the policy is directed to real persons whose personal data are processed by the Company automatically or by non-automatic means provided that they are part of any data recording system, the matters regarding the protection of the personal data of the Company employees are separately regulated in the "Policy on Protection and Processing of Personal Data of Employees" of Emas Demir Celik San. ve Dis Tic. Ltd. Sti.

2. Policy Principles

1. General Principles

The policy is published on the Company's website http://www.emasdemircelik.com.tr/, in a way that is open to the access of personal data owners. In parallel with the changes and innovations to be made in the legislation, the changes to be made in the Policy will be made accessible in a way that data owners can easily access.
In the event of a conflict between the legislation in force regarding the protection and processing of personal data and this Policy, the Company accepts that the legislation in force will apply.

2. Groups of Persons under the Policy

The data owner groups within the scope of the policy and whose personal data are processed by the Company are explained at the address of https://verbis.kvkk.gov.tr/Query/Search.
Company Employees, all natural persons not covered by the Personal Data Protection and Processing Policy.

3. Categorization of personal data

Pursuant to Article 10 of PDPL, the relevant persons are informed before our company and in line with the legitimate and lawful personal data processing purposes of our Company, based on one or more of the personal data processing conditions specified in Article 5 of the PDPL, and to a limited extent, regarding the processing of personal data in PDPL, Personal data in the categories specified at the address of https://verbis.kvkk.gov.tr/Query/Search are processed in accordance with the general principles specified in the PDPL, including the principles specified in Article 4, and all obligations set out in the PDPL, within the scope of this Policy.

4. Purposes of Processing of Personal Data

Our Company processes personal data, limited to the purposes and conditions within the personal data processing conditions specified in Article 5, paragraph 2, and Article 6, paragraph 3, of the Personal Data Protection Law No. 6698. These terms and conditions;

- It is clearly stipulated by the Laws that our Company's relevant activities regarding the processing of your personal data
- The processing of your personal data by our Company is directly related and required with the establishment or performance of a contract.
- The processing of your personal data is the mandatory status for our Company to fulfill its legal obligation.
- Provided that your personal data are made public by you; processing by our Company in a limited way for your publicization purpose
- The state of processing of your personal data by our Company is mandatory for the establishment, use, or protection of our Company or your or third parties' rights.
- It is mandatory to perform personal data processing for our Company's legitimate interests, provided that it does not harm your fundamental rights and freedoms,
- It is compulsory for our company to process personal data for the protection of the life or body integrity of the personal data subject or another person, and in this case, the personal data owner is unable to disclose his/her consent due to the actual impossibility or legal invalidity.
- Special quality personal data, other than the health and sexual life of the personal data owner, in cases stipulated by the law,
- Personal data of special quality in relation to the health and sexual life of the personal data subject are processed by persons or authorized institutions and organizations under the confidentiality obligation for the purpose of protecting public health, conducting preventive medicine, medical diagnosis, treatment and care services, planning and managing health services and financing.

In the unavailability of the above-mentioned conditions, the Company applies to the explicit consent of the personal data subjects in order to perform personal data processing.
For the following purposes;
- Our company performs the necessary work by our relevant business units in order to carry out the commercial activities carried out by the company and the related business processes are carried out;
- Ensuring the legal, technical, and commercial-business security of the company and the persons in business relations with the Company;
- Planning and execution of the activities required for the recommendation and promotion of the products and services that are offered by the company to the relevant persons by customizing them according to the tastes, usage habits, and needs of the relevant persons;
- Planning and execution of the commercial and/or business strategies of the Company;
- Performing the required works by our business units to make the relevant persons benefit from the products and services offered by the company, and carrying out the relevant business processes;
Within the planning and realization of the company's human resources policies and processes, they are processed for the following purposes, but are not limited to:

- Planning and execution of emergency management processes,
- Planning, control, and execution of information security processes,
- Establishing and managing the information technology infrastructure,
- Planning and execution of employee satisfaction and/or loyalty processes,
- Planning and execution of vested benefits and benefits for employees,
- Planning and execution of the right to access information for employees,
- Follow-up and/or control of employees' business activities
- Event management,
- Follow-up of finance and/or accounting works
- Follow-up of legal affairs,

- Planning of human resources processes,
- Planning and execution of business activities,
- Planning and execution of access to information authorization for business partners and/or suppliers,
- Management of relations with business partners and/or suppliers,
- Planning and execution of activities of corporate communication,
- Planning and/or execution of activities of corporate risk management,
- Planning and execution of activities of corporate sustainability,
- Planning and execution of activities of corporate governance,
- Planning and execution of processes of customer relationship management,
- Planning and/or monitoring of customer satisfaction processes
- Follow-up of customer demands and/or complaints
- Establishment and follow-up of a special car insurance policy for the vehicles purchased by the customer,
- Execution of personnel procurement processes
- After sales support services,
- Fulfillment of obligations arising from employment contracts and/or legislation for company employees,
- Ensuring the security of company fixtures and/or resources,
- Planning and execution of activities of company audit,
- Planning and execution of activities of external training,
- Planning and execution of the operational activities which are required to ensure that the company activities are carried out in accordance with the company procedures and/or the relevant legislation,
- Planning and execution of processes of intracompany appointment, promotion, and dismissal,
- Ensuring the security of the company premises,
- Planning and/or execution of processes of the company's financial risk,
- Planning and/or execution of processes of the company's production and/or operational risk,
- Realization of company and partnership law transactions,
- Follow-up of contract processes and/or legal demands,
- Execution of strategic planning activities,
- Planning and execution of processes of supply chain management,
- Planning and execution of human resources needs that are required for production,
- Planning and execution of processes of production and/or operation,
- Planning and execution of market research activities for the sales and marketing of products and services,
- Planning and execution of marketing processes of products and / or services,
- Planning and execution of the sales processes of products and/or services
- Planning and execution of processes of promotion and/or marketing of products and/or services
- Ensuring accurate and up-to-date data,
- Talent - career planning and development activities,
- Providing legislation based information to authorized persons and/or organizations,
- Creating and tracking visitor records,

A significant part of the activities carried out by our Company within the framework of these purposes are the activities and processes that do not require the explicit consent of the personal data subject specified in the paragraph 2 of Article 5 and paragraph 3 of Article 6 of the Law. Our company also

obtains the express consent of the personal data subject for the activities and processes that are not covered by the aforementioned articles of the Law.
It should not be forgotten that the personal data received within this scope can be used by our Company for activities that are enumerated in the Law and require explicit consent, as well as activities that allow data processing without explicit consent in the Law.

In case the personal data subject does not give his express consent, In case the personal data subject does not give his express consent; It is not that all personal data processing activities of our relevant business units, which have the above purpose, cannot be carried out; It should be understood that the personal data processing activities of our relevant business units, which are excluded from the personal data processing activities within the scope of the same purpose and that do not require the explicit consent of the personal data owner specified in the first paragraph, cannot be carried out.

5. Clarification of Personal Data Subjects

The company carries out the required processes in order to ensure that data subjects are informed, during the acquisition of personal data, in accordance with Article 10 of the PDPL. In this context, the following information is available in the clarification texts provided by the Company to data subjects:

1. The title of our company,
2. For what purpose the personal data of data subjects will be processed by the company,
3. To whom, and for what purpose, the processed personal data can be transferred,
4. The method and legal reason for the collection of personal data,
5. The following rights of the data subject;
    - Learning whether your personal data is processed or not, and requesting information if the personal data has been processed,
    - Learning the purpose of processing your personal data and whether they are used appropriately for their purpose,
    - Learning the third parties to whom your personal data is transferred domestically or abroad,
    - In case your personal data is incomplete or incorrectly processed, to request their correction and the action taken within this scope, requesting the notification of your personal data to third parties,
    - Requesting the deletion, destruction or anonymization of personal data within the framework of the conditions stipulated, and requesting that the process carried out be notified to third parties to whom personal data is transferred,
    - Objecting to the occurrence of a result against the individual himself/herself by exclusively analyzing the data processed through automated systems,
    - Requesting compensation for the damage in case of damage due to unlawful processing of personal data

6. Retention Periods of Personal Data

Our company gives enlightening explanations to personal data subjects during the acquisition of personal data, in accordance with Article 10 of PDPL. In this context, Emas Demir Celik San. ve Dis Tic. Ltd. Sti., gives the enlightening explanations such as the identity of its representative, if any, the purpose for which personal data will be processed, to whom and for what purpose the processed personal data can be transferred, the method and legal reason for collecting personal data, and the rights of the personal data owner.
In accordance with Article 11 of the PDPL, our company provides the necessary information in case the personal data subject requests information.

Emas Demir Celik San. ve Dis Tic. Ltd. Sti., as a basic principle, takes itself as a basis for the storage of personal data for the period specified in these regulations in case it is stipulated in the relevant laws and regulations. Regarding how long personal data should be stored, if a period of time is not regulated in the legislation; Personal data, depending on the activity carried out while Emas Demir Celik San. ve Dis Tic. Ltd. Sti is processing that data, In accordance with the Emas Demir Celik San. ve Dis Tic. Ltd. Sti's implementation and commercial life practices or the statute of limitations stipulated in the relevant laws, they are processed as long as it requires processing and then it is deleted, destroyed or anonymized. Accordingly, personal data:

1. Emas Demir Celik San. ve Dis Tic. Ltd. Sti. Retention and Deletion Periods of Personal Data, Data Qualification, Retention Period (Since the Termination of the Relationship) and Periodic Destruction Periods

- 10 (ten) Years for contractual relationships (TLO general limitation period). Periodically within the month in which ten (10) years are completed separately for each data and/or after the expiry of the data retention period within the six (6) month periodic destruction period determined by the data controller.
- 5 (five) Years for personal data processed due to lease relationship. Periodically within the month in which five (5) years are completed separately for each data and/or after the expiry of the data retention period within the six (6) month periodic destruction period determined by the data controller.
- 5 (five) Years for personal data on workers' wage rights. Periodically within the month in which 5 years are completed separately for each data and/or after the expiry of the data retention period within the six (6) month periodic destruction period determined by the data controller.
- 15 (fifteen) Years for Workers' Data on Health Inspections. Periodically within the month in which fifteen (15) years is completed separately for each data and/or after the expiry of the data retention period within the six (6) month periodic destruction period determined by the data controller.
- 5 (five) Years for tax records. Periodically within the month in which five (5) years are completed separately for each data and/or after the expiry of the data retention period within the six (6) month periodic destruction period determined by the data controller.
- 2 (two) Years for the processed personal data of consumers. Periodically within the month in which two (2) years are completed separately for each data and/or after the expiry of the data retention period within the six (6) month periodic destruction period determined by the data controller.
- 6 (six) Months for personal data of employee candidates. Periodically within the month in which six (6) months are completed separately for each data and/or before the expiry of the data retention period within the six (6) month periodic destruction period determined by the data controller.
- 6 (six) Months for visitors' personal data. Periodically within the month in which six (6) months are completed separately for each data and / or before the expiry of the data retention period within the six (6) month periodic destruction period determined by the data controller.

7. Processing of Personal Data and Special Qualification Data

Our company can transfer personal data and special quality personal data of the personal data subjects to third parties by taking the necessary security measures in line with the legal personal data processing purposes. In this direction, our company acts in accordance with the regulations stipulated

in the 8th article of PDPL. The persons and institutions to be transferred are explained at the address of https://verbis.kvkk.gov.tr/Query/Search

1. Transfer of Personal Data

In line with legitimate and legal personal data processing purposes, our company may transfer personal data to third parties, based on one or more of the personal data processing conditions specified in Article 5 of the Law.

Obtaining the Explicit Consent of the Personal Data Subject

One of the conditions for processing personal data is the owner's explicit consent. The explicit consent of the personal data owner should be explained on a specific subject, based on the information and with free will.

In case any of the conditions under this heading are not available for the reasons for obtaining personal data, these personal data processing activities by our Company are carried out based on the explicit consent of the personal data subjects to these processing activities.

For the purpose of processing personal data based on the explicit consent of the personal data subject, explicit consent is obtained from the data subject through legal methods determined by the Company.

Clear Stipulation in Laws

Personal data of the data subject may be processed in accordance with the law if explicitly stipulated in the law.

Failure to Obtain Explicit Consent of the Related Person Due to Actual Impossibility

Personal data of the data subject may be processed if it is necessary to process the personal data of the person who is unable to disclose his/her consent due to the actual impossibility or whose consent will not be accepted as valid, in order to protect the life or body integrity of his/her or another person.

Status of being Directly Related to the Establishment or Performance of the Contract

Provided that it is directly related to the establishment or execution of a contract, it is possible to process personal data in case it is necessary to process personal data belonging to the parties to the contract.

The Company's Fulfillment of its Legal Obligation

If processing is necessary for our company to fulfill its legal obligations as the data controller; Personal data of the data subject can be processed.

Making the Personal Data Public by Personal Data Subject

In case the data owner has made his/her personal data public by himself/herself, the relevant personal data can be processed.

Compulsory Data Processing for the Purpose of Establishing or Protecting a Right

In case data processing is mandatory for the establishment, use or protection of a right, the personal data of the data subject may be processed.

State of Mandatory Data Processing for the purpose of our Company's Legitimate Interest

Provided that the fundamental rights and freedoms of the personal data subject are not harmed, the personal data of the data subject may be processed if it is necessary for the legitimate interests of our Company.

2. The transfer of Special Qualification Personal Data

In line with the legitimate and lawful personal data processing purposes, our company takes the necessary security measures and adequate measures stipulated by the PDP Board and can transfer the private data of the personal data owner to third parties only in cases stipulated by law or in cases where the person has explicit consent.

8. Abroad Transfer of Personal Data

Our company is able to transfer the personal data and special quality personal data of the personal data owner to third parties residing abroad (by taking the precautions stipulated by the PDP Board) by taking the necessary security measures in accordance with the legal personal data processing purposes. Personal data can be transferred, by our company, to foreign countries which have been declared by PDP Board that have adequate protection ("Foreign Countries with Adequate Protection"), or in the absence of adequate protection, to foreign countries ("Foreign Country Where Data Controller Committing Sufficient Protection") where adequate protection is assumed in writing by those data controllers in Turkey and in the relevant foreign country and where the PDP Board has permission. Other sharings are shared by obtaining the necessary permissions from the data controller. In this direction, our company acts in accordance with the regulations stipulated in Article 9 of the PDP Law.

9. Personal Data Processing Activities in the Building, Facility Entrances and Inside the Building Facility, and Website Visitors

Personal data processing activities performed by our company at the building and facility entrances and within the facility are performed in accordance with the Constitution, PDP Law and other relevant legislation.

In order to ensure security, our company performs personal data processing activities for monitoring guest entries and exits with security cameras at our Company's buildings and facilities.

Personal data processing activity is carried out by our Company by using security cameras and recording guest entries and exits.

1. Camera Monitoring Activities that are performed by Emas Demir Celik San. ve Dis Tic. Ltd. Sti., in Building and Facility Entrances and within them

In this section, explanations regarding our company's camera surveillance system will be made and information will be given on how personal data, privacy and fundamental rights of the person are protected.

Our company, within the scope of surveillance activity with security cameras, acts for the purposes of increasing the quality of the service provided, ensuring its reliability, ensuring the safety of life and property of the company, data owner, and other persons, and protecting the legitimate interests of these.

- **Legal Basis of Camera Surveillance**

The camera surveillance activity performed by our company is carried out in accordance with the "Law on Private Security Services" and the relevant legislation.

- **Surveillance with Security Cameras According to PDP Law**

Our company acts in accordance with the regulations in the PDP Law in conducting video surveillance activities for security purposes.

Our company conducts security camera surveillance activities for the purposes stipulated in the laws and in accordance with the personal data processing conditions stipulated in the PDP Law in order to ensure security in its own building and facilities.

- **Announcement of Camera Surveillance Activity**

Enlightening information is provided to the personal data subject by our company in accordance with Article 10 of the PDP Law.

In addition to the clarification regarding general issues (See Section 3 / Title 3.3), our company makes notifications regarding the camera surveillance activity by more than one method.

In this way, it is aimed to prevent damage to the fundamental rights and freedoms of the personal data subject, and to provide transparency and enlightening explanation to the personal data owner.

- **The Purpose of Performing the Camera Surveillance Activity, and Being Limited with the Purpose**

In accordance with Article 4 of the PDP Law, our company processes personal data in a limited and measured manner in line with the purpose for which they are processed.
The purpose of our company in continuing the video camera surveillance activity is limited to the purposes listed in this Policy. In this direction, the monitoring areas of security cameras, their number, and when to be monitored are put into practice as sufficient and they are limited for this purpose. Monitoring is not carried out in areas (for example, toilets) that could result in an interference with the privacy of the person that exceeds security objectives.

- **Ensuring the Security of the Data Obtained**

The required technical and administrative measures are taken by our company in order to ensure the security of personal data obtained as a result of camera surveillance in accordance with Article 12 of the PDP Law.

- **Retention Period of Personal Data Obtained by Camera Surveillance**

Detailed information regarding the retention period of personal data obtained through our company's camera surveillance activity is included in the "Retention Period of Personal Data" article of this Policy.

- **The persons to whom the Access to the Information Obtained is provided as a Result of Monitoring, and to whom these Information Transferred**

Only a limited number of 5 (five) employees have access to digitally recorded and maintained records. The images of the live camera can be watched by the outsourced security guards (law enforcement services). The limited number of people who have access to the records are obliged to protect the confidentiality of the data within the framework of confidentiality commitment.

2. Storage of Records Regarding Internet Access Provided to Our Visitors in the Building and Its Facilities

In order to ensure security by our Company and for the purposes specified in this Policy, our Company provides internet access to our visitors who request during their stay in our Building and Facilities. In this case, the log records regarding your internet access are recorded in accordance with Law No.5651 and the governing provisions of the legislation regulated according to this Law, and these records are only processed when requested by the authorized public institutions and organizations or in order to fulfill our legal obligation in the audit processes to be carried out within the Company.
Only a limited number of 5 (five) employees have access to the log records obtained within this framework. Company employees, who have access to the aforementioned records, only access these records for use in the request or audit processes from the authorized public institutions and organizations and share them with legally authorized persons. The limited number of people who have access to the records are under the obligation to protect the confidentiality of these data accessed within the framework of the confidentiality commitment.

3. Website Visitors

Our company records the internet movements within the site with technical means (such as cookies) in order to ensure that the people who visit these sites on the web sites it owns perform their visits on the sites in accordance with the purposes of their visit, and to show them customized content and to carry out online advertising activities.
Detailed explanations in relation to the protection and processing of personal data regarding these activities of our company are included in the texts of the relevant websites http://www.emasdemircelik.com.tr/ Internet Site "PL.07 Access to Personal Data Personal Data Security and Privacy Policy".

10. Concluding the Requests of Personal Data Subjects

In case the data subjects submit their requests regarding their personal data to our Company in writing, the Company, as the data controller, performs the necessary processes in order to ensure that the request is concluded as soon as possible and within thirty (30) days at the latest, depending on the nature of the request.

Within the scope of ensuring data security, the company may request information in order to determine whether the applicant is the owner of the personal data subject to the application. In order to ensure that the application of the personal data subject is concluded in accordance with the request, our company may also ask a question to the personal data owner about his application.

In cases where the application of the data owner is likely to hinder the rights and freedoms of other people, requires disproportionate effort, and the information is public information, the request may be rejected .

11. Rights of Personal Data Subjects

In accordance with Article 11 of the PDP Law, you can make a request by applying to our Company on the following issues:

1. Learning whether your personal data is processed or not,
2. Requesting information if your personal data has been processed,
3. Learning the purpose of processing your personal data and whether they are used appropriately for their purpose,
4. Learning the third parties to whom your personal data is transferred domestically or abroad,
5. In case your personal data is incomplete or incorrectly processed, to request their correction and the action taken within this scope, requesting the notification of your personal data to third parties,
6. Although it has been processed in accordance with the provisions of the PDP Law and other related laws, in case the reasons for processing disappear; To request the deletion, destruction, or anonymization of your personal data and to request its notification to third parties to whom your personal data is transferred,
7. Object to the occurrence of a result against the individual himself/herself by exclusively analyzing the data processed through automated systems,
8. In case you suffer damage due to unlawful processing of your personal data, requesting the compensation of the damage.

12. Situations Other than the Rights of Personal Data Subjects as per the Legislation

In accordance with Article 28 of the PDP Law, since the following situations are not covered by the PDP Law, personal data subjects will not be able to assert their rights in the following matters:

1. Processing of personal data for artistic, historical, literary, or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, and public order, economic security, privacy, or personal rights or provided that it does not constitute a crime.
2. Processing personal data for purposes such as research, planning, and statistics by making them anonymous with official statistics.
3. Processing of personal data within the scope of preventive, protective, and intelligence activities performed by public institutions and organizations authorized by law in order to ensure national defense, national security, public security, public order, or economic security.
4. Processing of personal data by judicial authorities or execution authorities in relation to the investigation, prosecution, trial, or execution proceedings.

In accordance with Article 28/2 of the PDP Law; It will not be possible for personal data subjects to assert their rights, except for demanding compensation in the following cases:

1. Processing of personal data is required for the prevention of crime or for a criminal investigation.
2. The processing of personal data made public by the personal data subject himself/herself.
3. The processing of personal data is required for the execution of supervision or regulation duties and for disciplinary investigation or prosecution by authorized and authorized public institutions and organizations and professional organizations that have the quality of public institutions, based on the authority granted by law
4. Processing of personal data is required for the protection of the economic and financial interests of the State regarding budget, tax, and financial issues.

13. Complaint Right of Personal Data Subjects to PDP Board

In case the application is rejected in accordance with Article 14 of the PDP Law, and the response is insufficient or the application is not responded on time, the personal data subject can make a complaint to the PDP Board within thirty and in any case within sixty days from the date of application.

14. Emas Demir Celik San. ve Dis Tic. Ltd. Sti.'s Response to Applications

1. Our Company's Procedure and Duration to Respond to Applications

In case the personal data owner submits his/her request to our Company in accordance with the procedure, our Company will finalize the request at the soonest possible and within thirty days at the latest, depending on the nature of the request.

2. Information that Our Company may Request from Personal Data Subject Applying

Our company may request information from the person concerned in order to determine whether the applicant is the owner of personal data. In order to clarify the matters included in the application of the personal data subject, our company may ask a question to the personal data subject about his/her application.

3. Our Company's Right to Reject the Application of Personal Data Subject

Our company may reject the application of the applicant by explaining the reason in the following cases:

- Processing personal data for purposes such as research, planning, and statistics by anonymizing them with official statistics.
- Processing of personal data for artistic, historical, literary, 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, privacy, or personal rights or provided that it does not constitute a crime.
- Processing of personal data within the scope of preventive, protective, and intelligence activities performed by public institutions and organizations authorized by law in order to ensure national defense, national security, public security, public order, or economic security.
- Processing of personal data by judicial authorities or execution authorities in relation to the investigation, prosecution, trial, or execution proceedings.
- Processing of personal data is required for the prevention of crime or for criminal investigation.
- Processing personal data made public by the personal data subject.
- The processing of personal data is required for the execution of supervision or regulation duties and for disciplinary investigation or prosecution by the authorized and authorized public institutions and organizations and professional organizations having the status of public institutions, based on the authority granted by the law.
- Processing of personal data is required for the protection of the economic and financial interests of the State regarding budget, tax, and financial issues.
- The possibility of the personal data subject's request to hinder the rights and freedoms of other persons.

- Requests that require a disproportionate effort.
- The status of information requested is in the nature of public information.

15. Conditions for Deletion, Destruction and Anonymization of Personal Data

1. Obligation to delete, destroy and anonymize personal data

As regulated in article 138 of the Turkish Penal Code and article 7 of the PDP Law, in case the reasons for processing disappear although it has been processed in accordance with the provisions of the relevant law; Personal data are deleted, destroyed, or anonymized based on our company's own decision or upon the request of the personal data subject.

In cases where our company has the right and/or obligation to preserve personal data in accordance with the provisions of Article 5 paragraph (2) of the PDP Law, the right to not fulfill the request of the data subject is reserved.

2. Techniques for Deletion and Destruction of Personal Data

The most common deletion or destruction techniques that are used by our company are as listed below:

Physical Destruction

Personal data can also be processed in non-automatic ways, provided that it is a part of any data recording system. While this type of data is deleted / destroyed, the system of physical destruction of personal data in a way that cannot be used later is applied.

Secure Deletion from Software

While the data, which are processed in fully or partially automatic ways and stored in digital media, are deleted/destroyed, methods for deleting data from the relevant software in a way that cannot be recovered again are used.

Safe Deletion by the Professional Person

Emas Demir Celik San. ve Dis Tic. Ltd. Sti., may in some cases contract with an expert to delete personal data on its behalf. In this case, the personal data are securely deleted/destroyed by the expert on this subject so that they cannot be recovered again.

Anonymizing Techniques for Personal Data

The anonymization of personal data means that personal data are rendered in no way associated with a certain or identifiable natural person, even by matching them with other data. Our company can anonymize personal data when the reasons requiring the processing of personal data that are legally processed disappear.

In accordance with Article 28 of the PDP Law; Anonymized personal data can be processed for purposes such as research, planning, and statistics. Such processing is outside the scope of the PDP Law, and the explicit consent of the personal data subject will not be sought.

The anonymization techniques that are mostly used by our company are as listed below.

Masking

Data masking is a method of making personal data anonym by removing the basic identifying information of personal data from the data set.

Aggregation

With the data aggregation method, many data are aggregated and personal data cannot be associated with any person.

Data Derivation

With the data derivation method, a more general content is created than the content of personal data and it is ensured that the personal data cannot be associated with any person.

Mixed Data

With the data mixing method, it is ensured that the values in the personal data set are mixed and the tie among values and individuals is broken.

Ensuring the Security and Confidentiality of Personal Data

Emas Demir Celik San. ve Dis Tic. Ltd. Sti., takes all necessary measures according to the nature of the data to be protected, within the bounds of possibility, in order to prevent unlawful disclosure, access, transfer of personal data, or any security deficiencies that may occur in other ways.

In this context, all necessary (i) administrative and (ii) technical measures are taken by the Company and (iii) an audit system is established within the company and (iv) in case of unlawful disclosure of personal data, action is taken in accordance with the measures stipulated in the PDP Law.

16. Administrative Measures Taken by the Company to Ensure the Legal Processing of Personal Data and to Prevent Unlawful Access to Personal Data

Emas Demir Celik San. ve Dis Tic. Ltd. Sti., trains its employees on the law of personal data protection and ensures that they are made aware of it.

In cases where personal data are subject to transfer, Emas Demir Celik San. ve Dis Tic. Ltd. Sti., provides the addition of records to the contracts concluded with the persons to whom the personal data is transferred, stating that the party to whom the personal data is transferred will fulfill its obligations to ensure data security.

The personal data processing activities, which are performed by Emas Demir Celik San. ve Dis Tic. Ltd. Sti., are examined in detail and the steps to be taken to ensure compliance with the personal data processing conditions stipulated in the PDP Law are determined.

Emas Demir Celik San. ve Dis Tic. Ltd. Sti., determines the applications that should be fulfilled in order to comply with the PDP Law, and these applications are regulated by internal policies.

17. Technical Measures Taken by Emas Demir Celik San. ve Dis Tic. Ltd. Sti. to Ensure the Legal Processing of Personal Data and to Prevent Unlawful Access to Personal Data

With regard to the protection of personal data, technical measures are taken, by Emas Demir Celik San. ve Dis Tic. Ltd. Sti., to the extent that technology allows, and the measures taken are updated and improved in parallel with developments.

In technical matters, expert personnel are employed or services are procured.

For the implementation of the measures taken, audits are conducted by outsourcing at regular intervals. Software and systems are installed in order to ensure security.

Access authority to personal data being processed, within Emas Demir Celik San. ve Dis Tic. Ltd. Sti., is limited to the relevant employees in line with the specified processing purpose.

18. Conducting Audit Activities Regarding the Protection of Personal Data by the Company

The operation of the technical and administrative measures taken, within the scope of protecting and ensuring the security of personal data, are audited by Emas Demir Celik San. ve Dis Tic. Ltd. Sti., and practices are carried out in order to ensure the continuity of the process. The results of the audit activities performed in this context are reported to the relevant department within Emas Demir Celik San. ve Dis Tic. Ltd. Sti. In line with the audit results, activities are performed in order to develop and improve the measures taken for data protection.

19. Measures to be Taken in Case of Unlawful Disclosure of Personal Data

Within the scope of the personal data processing activity performed by Emas Demir Celik San. ve Dis Tic. Ltd. Sti., if the personal data are obtained by unauthorized persons illegally, the situation will be notified to the PDP Board and to the relevant data subjects without delay.

20. The Committee Responsible for the Protection and Processing of Personal Data

The "Personal Data Protection Committee" has been established by Emas Demir Celik San. ve Dis Tic. Ltd. Sti to ensure the necessary coordination within Emas Demir Celik San. ve Dis Tic. Ltd. Sti within the scope of ensuring, preserving, and maintaining compliance with the legislation on personal data protection. The Personal Data Protection Committee is responsible for the execution and improvement of the systems established in order to ensure unity among the Company units and to ensure that the activities performed to comply with the legislation on the protection of personal data.

In this context, the main duties of the Personal Data Protection Committee are as the following:

- To prepare and enforce basic policies in relation to the protection and processing of personal data,
- To decide how the policies in relation to the protection and processing of employee personal data will be implemented and how they will be monitored, and to make internal assignments and coordination within this context,
- To determine the issues to be performed in order to comply with the PDP Law and the relevant legislation; To observe its implementation and to ensure its coordination,
- Raising awareness within Emas Demir Celik San. ve Dis Tic. Ltd. Sti and among the institutions with which we cooperate regarding the protection and processing of personal data,
- To determine the risks that may occur in the personal data processing activities of Emas Demir Celik San. ve Dis Tic. Ltd. Sti., and to ensure that the necessary measures are taken; to offer improvement suggestions,
- To design and execute training on the protection of personal data and the implementation of policies,
- To decide the applications of personal data owners at the highest level,
- To Coordinate the execution of information and training activities in order to inform Personal data owners about personal data processing activities and legal rights of Emas Demir Celik San. ve Dis Tic. Ltd. Sti.,
- To prepare and put into effect the changes in basic policies regarding the protection and processing of personal data,
- To follow developments and regulations in relation to the protection of personal data; To advise senior management on what to do in Emas Demir Celik San. ve Dis Tic. Ltd. Sti's operations in accordance with these developments and regulations,
- Managing the relations with PDP Board and PDP Institution,
- To carry out other duties assigned by Emas Demir Celik San. ve Dis Tic. Ltd. Sti's management regarding the protection of personal data.