



**ANGST PFISTER GELİŐMİŐ TEKNİK
ÇÖZÜMLER A.Ő.**

**PERSONAL DATA PROCESSING AND
PROTECTION POLICY**

PERSONAL DATA PROCESSING AND PROTECTION POLICY

ARTICLE 1 – INTRODUCTION

The personal data processing and protection of the current and potential clients, suppliers, Company’s shareholders, employees and job applicants, our guests and the other firms’ employees, shareholders or the other third parties to whom we work with is a significant issue for Angst Pfister Gelişmiş Teknik Çözümler A.Ş. (hereinafter referred to as the “*Company*” or “*APTR*”) which fulfils steel service centre activities around the world.

This Personal Data Processing and Protection Policy (the “*Policy*”) regulates obligations to be fulfilled and procedures on the personal data processing and protection stipulated into the Personal Data Protection Law numbered 6698 (“*PDP Law*”) and the other secondary legislations.

ARTICLE 2 – PURPOSE OF THE POLICY

The main purpose of this Policy is to explain the activities and protection systems regarding the personal data processed and operated in accordance with the relevant legislations within the Company itself and its subsidiaries and to inform the data subject in this regard.

ARTICLE 3 – SCOPE OF THE POLICY

The provisions of this Policy includes any and all personal data processing of the personal data processing and protection of the current and potential clients, suppliers, Company’s shareholders, employees and job applicants, our guests and the other firms’ employees, shareholders or the other third parties to whom we work with, within our Company by fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means.

ARTICLE 4 – DEFINITIONS

Explicit Consent	refers to the freely given, specific and informed consent.
Personal Data	refers to all and any information relating to an identified or identifiable natural person (e.g. name-surname, ID no, e-mail, address, date of birth, credit card number etc.).
Personal Data Processing	refers to any operation performed upon personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable, classification or preventing the use thereof, fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means.
Data Subject	refers to all real persons processing personal data (e.g. clients, suppliers, employees, guests etc.)
Sensitive Personal Data	The personal data regarding the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions

and security measures, and the biometric and genetic data are deemed to be sensitive personal data.

Data processor refers to the real or legal person who processes personal data based on the authority granted by and on behalf of the data controller. For example, the suppliers who have been submitted information for employee candidates.

Data Controller refers to the real or legal person who determines the purposes and means of the processing of personal data, and who is responsible for establishment and management of the filing system. Our Company is deemed to be as data controller in this regard.

ARTICLE 5 – FUNDAMENTAL PRINCIPLES AND METHOD OF DATA PROCESSING

This Policy is a guiding legislation that sets forth the principles and procedures of the rules stipulated under the PDP Law and other related regulation. Our company shall analyse the data processing activities conducted by taking this Policy as a guideline, and shall determine all necessary actions and take all necessary administrative and technical measures within this scope. Upon implementation of these actions, the internal audit system shall be operated to ensure compliance with this Policy and to maintain this compliance. In addition to the internal audit system, the work regarding employee awareness shall be made and necessary orientation for new employees shall be applied; and necessary arrangements shall be made in relation to subsidiaries and business partners of our Company.

In all of these processes, our Company is aware that the personal data processed in order to ensure legal compliance of our Company, must comply with the general principles and provisions under the PDP Law and other related legislation. In this regard, the fundamental principles for personal data processing within the scope of the article 4 of the PDP Law are as follows:

The following principles shall be complied with when processing personal data:

- Being in conformity with the law and good faith,
- Being accurate and if necessary, up to date,
- Being processed for specified, explicit, and legitimate purposes,
- Being relevant, limited and proportionate to the purposes for which data are processed,
- Being stored only for the time designated by relevant legislation or necessitated by the purpose for which data are collected.

Within the framework of this context, all above-mentioned principles shall be taken into consideration by our Company while all personal data processing activities to be made such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable, classification or preventing the use thereof of the personal data.

ARTICLE 6 – PERSONAL DATA PROTECTION

In accordance with Article 12 of the PDP Law, APTR is obliged to take all necessary technical and administrative measures to ensure the appropriate level of security in order to prevent unauthorized processing and illegal access of personal data and to ensure protection of personal data. However, any security measures that may be determined by decisions of the Personal Data Protection Board ("**Board**") in the future shall also be taken into consideration and applied to our practice.

Personal data processed in a common database of APTR and its subsidiaries shall be kept confidential within the framework of technical and administrative measures taken in compliance with the article 12 of the PDP Law and shall never be shared with third parties for commercial purposes.

APTR shall conduct or make the third party to conduct internal audit system in conclusion of establishment of the necessary internal audit system with regards to the practice of technical and administrative measures to be taken into consideration pursuant to article 12 of the PDP Law.
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APTR is obliged to inform the data subject and if necessary the Board as soon as possible in the event of detecting the circumstances that processed personal data are obtained by way of contrary to the law or good faith.

In case of the realization of the violation possibility and violation itself of the personal data security that may arise in relation to personal data processed by our Company, any loss to may be occurred shall be determined accurately and the appropriate technical and administrative measures shall be taken immediately. When these risks are detecting, the first phase to be made is to determine whether the personal data is *(i)* sensitive personal data or not, *(ii)* the level of privacy required by the ordinary course, and *(iii)* the nature and quantity of the damage that may occur in the case of data security breaches.

After identifying and prioritizing these risks, there are controlling and solution alternatives to reduce or eliminate such risks shall be evaluated in accordance with the cost, feasibility and usefulness principles; and necessary additional technical and administrative measures shall be planned and put into practice.

ARTICLE 7 – PROTECTION OF SENSITIVE PERSONAL DATA

Sensitive personal data is defined as personal data regarding race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade-union, health, sexual life, criminal conviction and security measures, and biometrics and genetics. The unlawful processing of these personal data is being put special importance due to the serious risk of being victimization and discrimination of the data subjects.

Accordingly, our Company puts special importance into the protection of all personal data which is lawfully processed and categorized as “sensitive” by our Company. All necessary technical and administrative precautions taken for sensitive personal data pursuant to the article 6 of this Policy shall be applied diligently by our Company and necessary inspections shall be made within APTR.

Provided that precautions to be regulated by the Board and complied with the applicable law, processing of personal data varies from the existence of the explicit consent of data subject. In accordance with the above explanation, the sensitive personal data shall be processed

- ✓ With the explicit consent of the data subject.
- ✓ Without any explicit consent, if
 - other than personal data relating to health and sexual life, only if processing is permitted by any related law.

- Personal data relating to health and sexual life only for purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment, and care services, planning and management of health services and financing by persons under the obligation of secrecy or authorized institutions and organizations.

ARTICLE 8 – OBLIGATION TO INFORM

APTR is obliged to inform the data subjects while collecting their personal data for which reason and procedure of personal data processing to be in practice. In that sense, the minimum requirements stipulated under the article 10 of the PDP Law are regulated as follows:

- The identity of our Company and if any, our representative,
- The purposes for which personal data will be processed,
- The persons to whom processed personal data might be transferred and the purposes for the same,
- The method and legal cause of collection of personal data,
- The rights of the data subject.

As per the above-explanations, the personal data collecting channels will be detected at first and informing points and form will be regulated special for each channel.

ARTICLE 9 – THE RIGHT TO APPLY OF DATA SUBJECT

Data subjects shall claim particular rights with regard to the personal data processing by our Company and stipulated into the article 11 of the PDP Law by applying to our Company which is defined as data controller. In this regard, the data subject has right to

- Learn whether or not her/his personal data have been processed;
- Request information as to processing if her/his data have been processed;
- Learn the purpose of processing of the personal data and whether data are used in accordance with their purpose;
- Know the third parties in the country or abroad to whom personal data have been transferred;
- Request rectification in case personal data are processed incompletely or inaccurately;
- Request deletion or destruction of personal data,
- Request notification of the operations made as per indents article 11/ (d) and 11/ (e) of the PDP Law to third parties to whom personal data have been transferred;
- Object to occurrence of any result that is to her/his detriment by means of analysis of personal data exclusively through automated systems;
- Request compensation for the damages in case the person incurs damages due to unlawful processing of personal data.

In order to use the above-mentioned rights, the data subjects shall fill the "Application Form" which is available in our company's Human Resource department and security cabin that is in the entrance of our company and shall deliver the form to our Company through the channels stipulated under this Application Form. In case of the incompliance of the application procedure in the Application Form which is regulated in accordance with the article 13 of the PDP Law, the applications of the data subject shall not be evaluated.

ARTICLE 10 – OBLIGATION TO REGISTER TO THE REGISTRY OF DATA CONTROLLERS

Our Company shall submit the necessary information and documents pursuant to the provisions under the PDP Law and Regulation on Data Controllers' Registry in the period announced by the Board and register to the Data Controllers' Registry. The information and documents excluding the additional requirements of the Board, are stated as follows:

- Identity and address information of the data controller and of the representative thereof, if any.
- The purposes for which personal data will be processed.
- The group or groups of persons subject to the data and explanations regarding data categories belonging to these persons.
- Recipient or groups of recipients to whom personal data may be transferred.
- Personal data which is envisaged to be transferred abroad.
- Measures taken for the security of personal data.
- The maximum period of time necessitated by the purposes for which personal data are processed.

ARTICLE 11 – TRANSFER OF PERSONAL DATA

Transferring personal data shall be legitimate and justifiable in accordance with data subject's explicit consent or provided that sufficient precautions are taken, the exceptions in Article 5 of the PDP Law or with the exception of Article 6/3 of the LPDP and other laws. APTR shall transfer the personal data within these principles and conditions.

In addition to these, personal data may be transferred abroad by having the explicit consent of the data subject or without obtaining any explicit consent of the data subject if one of the conditions set forth in the second paragraph of article 5 or third paragraph of article 6 is present and

- If the foreign country to whom personal data will be transferred has an adequate level of protection,
- In case there is not an adequate level of protection, if the data controllers in Turkey and abroad commit, in writing, to provide an adequate level of protection and the permission of the Board exists.

ARTICLE 12 –PERSONAL DATA PROTECTION COMMITTEE

A Personal Data Protection Committee will be established in order to fulfil the obligations under PDPL and related legislation, ensure and monitor the implementation of the policies, make recommendations for their functioning, and ensure the execution of the processes for protecting, processing, storing and destroying personal data. The Committee is responsible for ensuring audit, compliance and sustainable effectiveness under the Personal Data Protection legislation

ARTICLE 13 - EXECUTION OF THIS POLICY AND THE RELEVANT REGULATION

The applicable law in respect of personal data processing and protection, secondary regulations, other relevant law and this Policy will be applied within APTR. However, in case of any dispute and inconsistency revealed between the applicable legislation and this Policy, our Company agrees and accepts that the applicable legislation will be applied.

ARTICLE 14 – EXECUTION DATE OF THIS POLICY

The execution date of this Policy is April 2nd, 2018. In case of amendment of all or some particular articles, the execution date of this Policy will be updating.

This Policy is submitted to physically reach of everyone whose personal data being processed by our Company through our company's website <https://www.angst-pfister.com/tr>, Company's Human Resources Department and security cabin that is in the entrance of our company.