



PERSONAL DATA PROTECTION AND PROCESSING POLICY

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1- PURPOSE

The basic information on the Protection of Personal Data and the consents granted for PRIVACY and PERSONAL DATA PROTECTION to İNOXNET YAPI SİSTEMLERİ SANAYİ VE DIŞ TİC. A.Ş. ("İNOXNET") are given below.

If the section referring to these RULES is approved, it will be deemed ACCEPTED by the Data Subject and to have knowledge of all of these rules, to read them and to authorize the INOXNET with respect to this content. Law No. 6698 on Protection of Personal Data was published in the Official Gazette dated April 7, 2016 and numbered 29677. The PDP Law is designed to protect the fundamental rights and freedoms of natural persons, including the privacy of persons whose Personal Data is processed and protected by the Constitution, and to determine the obligations of natural and legal persons who process Personal Data. In addition, the Law No. 6563 on the Regulation of Electronic Commerce contains provisions on the Protection of Personal Data. The provisions of the Turkish Penal Code No. 5237 also stipulate criminal sanctions for the Protection of Personal Data in some cases.

2- SCOPE

In order to fulfil the obligation of disclosure arising from the Article 10 of the Law on the Protection of Personal Data No. 6698, INOXNET presents the following explanations to the information and attention of the 3rd parties who use our website.

INOXNET has the right to update these Personal Data Protection policies at any time, in part or in whole, within the framework of any changes to the applicable legislation, and any changes to the legislation will be considered binding on both INOXNET and our followers.

3- RESPONSIBILITIES

3.1 Data Processing

Pursuant to the PDP Law, it means obtaining Personal Data in whole or in part by automatic or non-automatic means provided that it is part of any data recording system, saving, storing, changing, rearranging, explaining, transferring, data retrieval, all kinds of operations performed on the data, such as making the data available, classifying it or preventing it from being used.

3.2 Representative of Data Controller

When the Data Controller Register is established, INOXNET will appoint a data representative required for registration in the Data Controller Register, which will appoint an Expert Representative to be responsible for the protection and processing of all Personal Data, taking security measures and conducting regular audits.

3.3 Data Processor

Natural or legal persons who process Personal Data on behalf of INOXNET, in accordance with the authority granted by INOXNET, of the data archived within the consents given by the data subjects permissions granted by the relevant regulations.

3.4 Responsibility

In case of processing of Personal Data by another natural or legal person on behalf of INOXNET by the authority granted by INOXNET, INOXNET as the Data Controller and the 3rd persons shall be jointly responsible for the necessary protection and measures ordered by legislation.



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INOXNET, as a data Controller under its responsibilities under the regulations, periodically checks the compliance of data processors with the Privacy Policy in order to ensure that the trust they provide to those who share their Personal Data is maintained in the same way by their business partners, service providers, suppliers, and contractors.

4- DEFINITIONS AND ABBREVIATIONS

In this section, special terms and phrases in politics, concepts, abbreviations, etc. are briefly explained.

4.1 INOKSNET

INOKSNET YAPI SİSTEMLERİ SANAYİ VE DIŞ TİC. A.Ş.

4.2 Explicit Consent

The Consent which is limited to data processing for an issue, based on the information and free will.

4.3. Anonymization

Making Personal Data unable to be associated with a specific or identifiable real person under any circumstances, even by matching it with other data.

4.4. Employee

Employee of INOXNET

4.5. Service Provider

Personnel of the company (supplier, subcontractor, etc.) from which INOXNET receives and/or provides services.

4.6. Personal Data Owner (Data Subject)

The actual person whose Personal Data is processed.

4.7. Personal Data

Any information relating to a specific or identifiable real person.

4.8 Special Categories of Personal Data

Information that, if learned, may cause the relevant person to be victimized or discriminated against.

4.9 Processing of Personal Data

Obtaining Personal Data in whole or in part by automatic or non-automatic means provided that it is part of any data recording system, saving, storing, changing, rearranging, explaining, transferring, data retrieval, all kinds of operations performed on the data, such as making the data available, classifying it or preventing it from being used.

4.10 Data Processor

A natural or legal person who processes Personal Data on behalf of the Data Controller based on the authorization given by the Data Controller.



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4.11 Data Controller

A real or legal person who determines the purposes and means of processing Personal Data, is responsible for the establishment and management of the data recording system and is obliged to register with the Data Controller Register.

4.12 PDP Board: Personal Data Protection Board.

4.13 PDP Institution: Personal Data Protection Authority.

4.14 PDP Law: Personal Data Protection Law which was published in Official Gazette with the date 07 April 2016 and number No: 29677

4.15 Policy: INOXNET's Policy for the Protection and processing of Personal Data.

5. APPLICATIONS

5.1. Ways of collecting personal data

The data provided by the people who make transactions on the <http://www.inox-net.com> website or on the mobile website are processed by INOXNET in accordance with their consent and the provisions of the legislation. INOXNET may match information collected from you different times or through different methods, such as information collected online and offline, and may use this information in conjunction with information from other sources, such as third parties.

6. LEGAL OBLIGATIONS

According to PDP law, INOXNET has legal obligations for the protection and processing of Personal Data. The obligations are listed as follows:

6.1 Obligation to Inform

During the collection of Personal Data, INOXNET is obliged to inform the data subject about the following matters within the framework of the legislation:

- The identity of the Data Controller and its representative, if any,
- The purpose for which the Personal Data will be processed,
- To whom and for what purpose the Personal Data can be transferred,
- The legal reason for collecting Personal Data,
- Rights of the relevant person.

Within the scope of INOXNET's enlightening obligation; INOXNET informs people about the different means of processing their Personal Data. In addition, INOXNET emphasizes that its public policies can be understood by the owners of Personal Data. Tools will be used to inform the relevant persons have been determined by internal policies.

6.2 Obligation to inform about rights of the Data Subject

The rights regarding the protection of personal data of the person whose the Personal Data is processed are set out in Article 11 of the PDP law (Section 12 of this document). In accordance with PDP law, INOXNET is obliged to evaluate the requests for such rights and inform the relevant persons within the scope of the action to be taken in accordance with their demands and this notification shall be carried out within the period ordered by the legislation.



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Such requests must be communicated to INOXNET in writing by the data subject or by other means determined by the PDP Board. INOXNET is working to provide more opportunities to apply and to exercise his/her rights to the data subject so as not to contradict the board's decision on this matter.

6.3 Obligation to ensure data security

In its capacity as the Data Controller, the obligations related to data security arising from Article 12 of PDP law are stated by policies, especially Section 11 of this document, and without limitation, the relevant legislation and the mandatory matters brought by the Board shall also be applied by INOXNET separately.

6.4 Obligation to register at the Data Controllers Register

In accordance with Article 16 of the PDP Law, INOXNET is obliged to register with the Data Controller Register within the period determined and announced by the PDP Board in accordance with the Regulation and other legislation.

7. CLASSIFICATION OF PERSONAL DATA

7.1 Personal Data

PDP law defines the Personal Data as any information relating to a specific or identifiable real person. In this context, the person's data must be specific or identifiable (when combined with other information, the person must be identifiable). A person's name, surname, date, and place of birth, identity, social security number, phone number, address, images, payment information, health information, and other such information are under the definition of Personal Data.

The subject of Personal Data Protection is natural persons and legal persons are excluded from the scope. Therefore, information that does not contain real person's information, such as a legal person's registration number, trade name, and registration information is not protected as Personal Data in accordance with the law.

7.2 Special Categories of Personal Data

Special Categories of Personal Data is the information that, if learned, can lead to victimization or discrimination and in PDP it is defined as;

“Data relating to 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 are special categories of personal data.”

The processing of Special Categories of Personal Data without the explicit consent of the data subject is prohibited except in cases expressly authorized by the law.

In this regard, such Personal Data shall not be processed by INOXNET except in cases where it is required to be processed in accordance with the Law or processed in accordance with the conditions specified in Article 6 of the PDP Law, with the explicit consent of the data subject.

8. RULES FOR PROCESSING PERSONAL DATA

8.1 Principles regarding the processing of Personal Data

All Personal Data collected will be processed in accordance with the principles specified in Article 4 of the Law on the PDP and the conditions specified in Articles 5 and 6. In accordance with Article 4 of the PDP Law; INOXNET is responsible for the processing of Personal Data in accordance with the law and honestly, accurate and, if necessary, up to date, for specific, clear and legitimate purposes in a limited and measured manner.



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İNOKSNET, KVK Kanunu 4. maddesi uyarınca; kişisel verilerin işlenmesi konusunda hukuka ve dürüstlük kuralına uygun, doğru ve gerektiğinde güncel, belirli, açık ve meşru amaçlar güderek, amaçla bağlantılı, sınırlı ve ölçülü biçimde kişisel verileri işlemekle sorumludur.

In this framework;

- INOXNET is obliged to act in accordance with the rules, prohibitions, rights, and principles stipulated by laws and other legislations during the processing of Personal Data.
- INOXNET shall be transparent during the processing of Personal Data and comply with the obligation to inform in order to comply with the rules of good faith.
- INOXNET will be able to process Personal Data for legitimate and lawful reasons, i.e. only for explicitly defined and lawful purposes, within the scope of the authorization granted to it when it is required to obtain consent.
- INOXNET will process Personal Data to the extent necessary. In this context, considering the principle of proportionality, Personal Data will not be used except for the activities carried out by INOXNET and the situations required by the purpose of these activities. Furthermore, if the processing of Personal Data is not needed or required, it will be avoided to not to exceed the measure to achieve the goal.
- INOXNET shall retain Personal Data for as long as is necessary for the purpose for which they are processed or provided for in the relevant legislation and shall not, after the expiration of this period, store such data without anonymizing it (where possible) for any reason.

8.2 INOXNET's Personal Data processing purposes

8.2.1 INOXNET is processing the Personal Data in accordance with the provisions of Articles 5 and 6 of the PDP Law with the consent of the data subject in cases where consent is required. Name-surname, telephone, e-mail information are used for communication purposes. The data collected in this direction is used to provide better service by enhancing it with the execution and development of operational activities such as business development, marketing and communication.

8.2.2. Except for the data-based purposes stated above, data is generally collected within the following considerations.

- Sending messages, newsletters and other publications via e-mail and similar platforms
- To answer questions and provide an effective service,
- Delivering information about new services,
- To record the address and other necessary information for communication,
- To issue all records and documents that will be the basis of the transaction in electronic (internet/mobile etc.) or paper environment,
- To be able to provide information to public officials upon request and in accordance with the legislation on public safety issues,
- To be able to offer suggestions by our contracted institutions and solution partners and to inform them about our services,
- To be able to evaluate the complaints and suggestions about our services,
- To fulfil our legal obligations and to exercise the rights arising from the legislation in force.



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8.3 Ensuring that Personal Data is processed in accordance with the law

INOXNET is obliged to take the following technical measures for the processing of Personal Data in accordance with the law.- Kişisel verilerin Kanun'a uygun bir şekilde işlenmesi ve depolanması için şirket içi organizasyonu yapmak,

- To establish an in-house organization for the processing and storage of Personal Data in accordance with the law,
- To establish the technical infrastructure to ensure the security of the databases where Personal Data will be stored,
- To ensure the supervision of the technical infrastructure and processes created,
- To determine procedures for reporting technical measures and audit processes taken,

INOXNET shall take the following administrative measures for the processing of Personal Data:

- To inform and educate company employees about the legal protection and processing of Personal Data,
- To record the measures to be taken in cases of unlawful processing of Personal Data by the employees of the company in the contracts, documents or policies made with the employees of the company,
- INOXNET is responsible for supervising the processing of Personal Data of the data processors and partners it works with.

9. TRANSFER OF PERSONAL DATA POLICY

The sharing of Personal Data with third parties takes place with the consent of the data subject, and as a rule Personal Data is not transmitted to third parties without the consent of the data person/owner. However, due to and limited by our legal obligations, Personal Data may be shared with the courts and other public institutions in a manner that is not in violation of the legislation on PDP.

Personal Data can be shared with INOXNET shareholders, with our direct/indirect and/or domestic/international affiliates, our collaborative partners for our programs to carry out activities of our institutions, cloud data storage services, with organization we've contracted for sending commercial electronic messages, with banks, and in order to deliver better service abroad and various agencies within the scope of various marketing activities, advertising companies, survey companies and domestic/overseas with other third parties, and our business partners and other third partners.

9.1 Domestic data transfer

INOXNET is obliged to act in accordance with the decisions and regulations taken by the PDP board as prescribed in the PDP law regarding the transfer of Personal Data. Personal Data and Special Categories of Personal Data of related parties may not be transferred by INOXNET to other natural persons or legal entities without the explicit consent of the relevant person. In so far as, where required by the PDP Law and other Laws, the data may be transferred to the authorized administrative or judicial institution or organization without the explicit consent of the relevant person as bound by the legislation. It may also be transmitted without the consent of the relevant person in the cases provided for in paragraph 2 of Article 5, or in paragraph 6 of Article 6 for Special Categories of Personal Data, as provided for in Article 8 of the PDP Law (e.g. compulsory for the establishment or performance of a contract or the fulfilment of a legal obligation).

INOXNET, taking all necessary security measures, and ensuring the use of Personal Data is prevented after the commercial relationship ends, may transfer Personal Data to third parties in accordance with the legislations.



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9.2 Transfer of Personal Data to abroad

INOXNET shall not transfer confidential information abroad except in cases where the it has received the relevant person's consent. However, INOXNET may transfer Personal Data abroad for processing and storing outside Turkey. In exceptional cases where explicit consent is not sought for the transfer of Personal Data, as set out in the PDP law, in addition to the non-consensual processing and transfer requirements, adequate protection is required in the country where the data will be transferred. The PDP Board shall determine whether adequate protection is provided and if there is not enough protection, the data controllers in both Turkey and the relevant foreign country must undertake adequate protection in writing and have the consent of the PDP Board.

9.3 The measures taken by the INOXNET regarding the legal transfer of Personal Data

- **Technical measures:**

INOXNET shall take measures to prevent unauthorized access and use of Personal Data by different affiliates and by different units within the affiliates and by the real or legal persons who process Personal Data on behalf of INOXNET.

- **Administrative measures**

INOXNET establishes internal policies regarding who should be given access to Personal Data and for what purpose by different affiliates, different units within the affiliates and by real or legal persons who process Personal Data on behalf of INOXNET. INOXNET is responsible for overseeing the Personal Data processing activities carried out by natural or legal persons who process Personal Data on its behalf, based on authority given.

10. STORAGE OF PERSONAL DATA POLICY

10.1 Retaining for the period required by the legislation or for the purpose for which they were processed

In accordance with Article 7 of the PDP Law and Article 138 of the Turkish Penal Code, INOXNET shall only retain the Personal Data it has processed for as long as required by the purpose of Personal Data processing unless the relevant legislation provides for a different period. The retained data will be erased after the purpose of the retention of the data ends, and the maximum period of deletion is 2 years at average after the end of the purpose of the retention of the data; and in the case of statutory and mandatory requirements that may be longer or shorter, the data will remain in the system for the period specified in the legislation. For this reason, a different retention period may apply to each Personal Data, as provided for in the relevant legislation or as required for the purpose for which they are processed. For example, in accordance with Article 253 of the Tax Procedure Law, commercial books and documents must be kept for 5 (five) years.

On the other hand, a data may also be processed for more than one purpose, and in such a case, if there is no regulation in the legislative office ordering otherwise, the relevant data will be deleted, destroyed or stored anonymously if all the reasons for the processing of the relevant data are eliminated.

10.2 The measures taken by the INOXNET regarding the storage of Personal Data

Personal Data, processed in accordance with the provisions of the PDP Law and other legislation, when the reasons requiring processing ends, shall be deleted, destroyed or anonymized by INOXNET on its own initiative or at the request of the relevant person. The procedures and principles regarding the destruction or anonymization of Personal Data shall be carried out in accordance with the principles and rules specified in the PDP Regulation.



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- **Technical measures that have been taken**

Necessary systems and control mechanisms for deleting, destroying and anonymizing Personal Data are established by INOXNET.

- **Administrative measures that have been taken**

INOXNET informs real or legal persons who process Personal Data on its behalf about protecting Personal Data in accordance with the legislations, raises awareness, and takes measures in contracts entered to ensure the Personal Data is processed, deleted and destroyed and anonymized in accordance with the law.

11. SECURITY POLICY OF PERSONAL DATA

11.1 INOXNET's Data Security Obligations

Pursuant to Article 12 of the PDP Law, INOXNET's obligations regarding data security as Data Controller are as follows;

- To prevent unlawful processing,
- To provide unlawful access,
- To take all kinds of measures for safe keeping,
- To take all kinds of technical and administrative measures,
- To make or have the necessary audits done within the organization,
- To take necessary measures to ensure that the third person or the officials working in their organization do not disclose the Personal Data they learned during their duties in contradiction with the provisions of the law and use it for purposes other than processing, even after their employment ends,
- To inform the Data Subject and the Board if the processed Personal Data is unlawfully seized by others.

11.2 Measures taken by INOXNET regarding data security

In order to fulfil its obligations regarding the security of Personal Data and to act quickly when there is a security risk, INOXNET shall take the following measures:

11.2.1. Technical and administrative measures taken to prevent unlawful access to Personal Data, The technical and administrative measures taken regarding the processing, transfer and storage of Personal Data are listed in the relevant sections. Although INOXNET is obliged to take these measures completely and to prevent unlawful access; if unlawful access to the Personal Data by third parties happens; INOXNET takes all technical and administrative measures in order to protect the Personal Data in accordance with the relevant legislation and Board decisions.

11.2.2. Measures taken for the Protection of Personal Data and their auditing, The data recording systems used within INOXNET are established and used in accordance with the PDP Law and the relevant legislation and are periodically monitored and audited and reported to the authorized person or board to the extent required by the legislation. INOXNET is obliged to inform natural or legal persons who process Personal Data on its behalf and raise their awareness about the Protection of Personal Data; at the same time to set provisions for the Protection of Personal Data within the framework of the contracts concluded with these persons.

11.2.3. Measures to be taken in case of unauthorized disclosure of Personal Data, INOXNET is obliged to take measures to prevent unauthorized disclosure of Personal Data and to



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establish a domestic policy on it. In addition, in such cases, INOXNET, as a chief Data Controller, is responsible for informing individuals whose Personal Data has been disclosed in an unauthorized manner and the PDP Board.

12. RIGHTS OF THE RELEVANT PERSON

In accordance with the PDP, the Data Subject has the following rights regarding their Personal Data;

- learning whether they are processed,
- if processed, to request information,
- to learn the purpose of processing and whether it is used appropriately,
- to know the third persons who data are transferred to in domestic / abroad,
- to request correction if missing / incorrectly processed or changed,
- to request their Personal Data to be deleted/destroyed within the framework of the conditions stipulated in Article 7 of the PDP Law,
- to request the third parties to whom Personal Data is transferred to, to be notified of the transactions carried out in accordance with paragraphs (d) and (e) listed above,
- to object to the occurrence of a consequence, as it is exclusively analysed by automated systems,
- in case they have suffered loss due to actions being committed in violation of the PDP Law, to request damages.

Right to Access to Personal Data;

Data Subjects have the right to access their Personal Data without charge. Therefore, INOXNET commits to provide those to the Data Subjects under the relevant legislation;

- Learn whether Personal Data is being processed,
- Request information whether or not Personal Data has been processed,
- Learning the purpose of procession of Personal Data and whether they are used appropriately,
- Having right to request to know third parties to whom Personal Data is transmitted in domestic or abroad.

Data Subject's right to change and/or delete the Personal Data;

The data subject have the right to request to change or delete their Personal Data without charge. In this context;

- To request correction of Personal Data if it is incomplete or incorrectly processed,
- To request the deletion or destruction of Personal Data if the reasons for the processing of Personal Data are removed,
- To request that the above-mentioned correction, deletion, or destruction be notified to third parties to whom your Personal Data has been transferred,
- To object to the occurrence of a disadvantage, as it is exclusively analysed by automated systems.

WE HAVE AN OBLIGATION TO ENSURE THAT YOUR PERSONAL DATA IS ACCURATE AND UP-TO-DATE AS REQUIRED BY THE PDP LAW, SO PLEASE KEEP US INFORMED OF ANY CHANGES IN YOUR SITUATION TO KEEP YOUR PERSONAL DATA ACCURATE AND UP-TO-DATE.

Application of the data subject and evaluation of the application;

The relevant persons may, without limitation, make a request to INOXNET for access to their Personal Data processed by INOXNET as soon as possible in pursuant to the rights provided by the relevant legislation and for the exercise of the above-mentioned rights.



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INOXNET creates the necessary channels to meet these requests. Applications shall be answered as soon as possible and in any case within the period stipulated in the law of the PDP.

The Data Controller representative shall finalize the requests for the processing and Protection of Personal Data as soon as possible and in any case no later than 30 days free of charge.

In any case, the relevant person may reach INOXNET through one of the communication channels under the previous sub-paragraph and communicate his/her demand. For this period to begin, requests made by the persons concerned must be sent to the data representative in writing or other methods determined by the Board of the PDP and must also be fully communicated in the documents identifying the data subject. Until another method is determined by the Board, applications must be made in writing. During the application to be made by the relevant person, the relevant person should clearly state which right he will be using and send the information and relevant documents, if any, to the following address via a return- registered letter with return receipt; "Rüzgarlibahçe Mah. Selvi Çikm. Sok. No:2 Plaza K. İş Merk.Kat:5 Kavacik/İstanbul Turkey". The requests made by the relevant person are accepted by the representative of the Data Controller or rejected by explaining the reasons in pursuant to the legislation and the answer shall sent in written or electronic media. If the application is accepted, it will be fulfilled by INOXNET. In some cases, due to legal obligations or other reasons specified in accordance with Articles 5 and 6 of PDP law, no positive response may be given to the request regarding the processing/modification/deletion of Personal Data. In this case, the reasons for rejection will be justified in detail and the legal basis will be reported.

In case the application is rejected by INOXNET in accordance with the legal regulations, if the answer given is insufficient or no response is given within the time limit and the relevant person has the right to complain to the Board of the PDP within 30 (thirty) days from the date of learning of the reply and in any event within 60 (sixty) days from the date of application.

13. PUBLICATION OF THIS DATA POLICY

These policies and rules, together with the disclosure obligation under the legal legislation, will be notified to users who have Personal Data and will be published on INOXNET's web sites as well.

14. REVISIONS AND UPDATES

The rights owned by the data holder in accordance with PDP are the obligations of INOXNET. In this context, in case of any amendments are made in accordance with the economic and commercial decisions of the INOXNET or the legislation or the decisions of the Board of Protection of Personal Data, relevant persons whose data are processed shall be notified through at least one of the existing registered contact information such as e-mail, sms, voicemail and so on.

15. RIGHT TO GET INFORMATION

You can contact us at any time for any questions and comments regarding your Personal Data via the info@inox-net.com

In addition, you can send a letter with return receipt to

"Rüzgarlibahçe Mah. Selvi Çikm. Sok. No:2 Plaza K. İş Merk.Kat:5 Kavacik/İstanbul Turkey". and get the information on specified matters via the preferred communication way.