



**PROCESSING AND PROTECTION OF
PERSONAL DATA POLICY**

DOC.NO	MYDE.04.02
REV.NO	01
DATE OF ISSUE	08.12.2019
REV.DATE	06.06.2024
PAGE NO	1 / 11



MYD ENDÜSTRİYEL KİMYEVİ MAD. SAN. VE TİC. LTD. ŞTİ.
PROCESSING AND PROTECTION OF PERSONAL DATA POLICY



PROCESSING AND PROTECTION OF PERSONAL DATA POLICY

DOC.NO	MYDE.04.02
REV.NO	01
DATE OF ISSUE	08.12.2019
REV.DATE	06.06.2024
PAGE NO	2 / 11

PROCESSING AND PROTECTION OF PERSONAL DATA POLICY

1. INTRODUCTION

This Policy for the Processing and Protection of Personal Data ("Policy") explains the principles adopted by **"MYD Endüstriyel Kimyevi Mad. San. Ve Tic. Ltd. Şti."** (hereinafter referred to as **"MYD Endüstriyel"**) in conducting personal data processing activities as well as outlines the basic principles **MYD Endüstriyel** has adopted to ensure compliance with the regulations stipulated in the Personal Data Protection Law No. 6698 ("Law") and informs personal data subjects about the provisions of the law and general principles adopted by our company.

In full awareness of our responsibility in this regard, your personal data is processed and reasonably protected within the scope of this Policy.

2. PURPOSE OF THE POLICY

The main purpose of this Policy is to establish the principles regarding the personal data processing activities and protecting the personal data lawfully by **MYD Endüstriyel**, and to ensure transparency by enlightening and informing individuals whose personal data is processed by our company.

3. SCOPE OF THE POLICY

In this Policy, regarding your personal data processed by **MYD Endüstriyel**; the principles of processing personal data and personal health data, the purposes and conditions for processing this data, the transfer of data domestically and abroad, its destruction, and the practices and principles related to your rights over the processed data are notified to you below.

4. ACCESS AND UPDATING

The Policy is published on our company's website, made accessible to the relevant individuals upon request, and updated when necessary. (In accordance with Article 4 of the Personal Data Protection Law No. 6698, the personal data we collect and process must be accurate and up-to-date when necessary. Therefore, if there is any change in your personal data, you can notify us of your updated and accurate personal information using the methods specified in the Information Text on our website.)

Our company reserves the right to make changes to the Policy in line with legal regulations.

In the event of a conflict between the provisions of this Policy and the current legislation, primarily the Law, the provisions of the legislation shall apply.

5. DEFINITIONS

The definitions used in this Policy are provided below:

Explicit consent	Consent based on being informed and given freely, related to a specific matter.
Anonymization	Making personal data in no way associable with an identified or identifiable real person, even when matched with other data.



PROCESSING AND PROTECTION OF PERSONAL DATA POLICY

DOC.NO	MYDE.04.02
REV.NO	01
DATE OF ISSUE	08.12.2019
REV.DATE	06.06.2024
PAGE NO	3 / 11

Personal data	Any kind of information relating to an identified or identifiable real person.
Processing of personal data	Any kind of operation performed on personal data such as obtaining, recording, storing, preserving, modifying, rearranging, disclosing, transferring, acquiring, making it available, classifying, or preventing its use, whether wholly or partly by automated means, or by non-automated means provided that it is part of any data recording system.
KVK Law	Law No. 6698 on the Protection of Personal Data.
KVK Board	The board responsible for the protection of personal data.
KVK Authority	The institution responsible for protection of personal data.
Special category personal data	Data related to a person's race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, clothing, association, foundation, or union membership, health, sexual life, criminal conviction, and security measures, as well as biometric and genetic data.
Data subject	The real person whose personal data is processed, referred to as the "relevant person" in the Personal Data Protection (KVK) Law.
Data controller	The real or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.
Data processor	The real or legal person who processes personal data on behalf of the data controller based on the authority given by the data controller.
Data Controllers Registry	The registry of data controllers kept by the Presidency under the supervision of the Personal Data Protection Board (VERBİS).
Data inventory:	The inventory created and detailed by MYD Endüstriyel in relation to personal data processing activities it carries out, associating it with personal data processing purposes, the recipient group to which personal data is transferred and the relevant personal data owner group.



PROCESSING AND PROTECTION OF PERSONAL DATA POLICY

DOC.NO	MYDE.04.02
REV.NO	01
DATE OF ISSUE	08.12.2019
REV.DATE	06.06.2024
PAGE NO	4 / 11

6. PERSONAL DATA INVENTORY AND CLASSIFICATION OF PERSONAL DATA

Within **MYD Endüstriyel**, based on the legitimate and lawful personal data processing purposes of **MYD Endüstriyel**, personal data is processed in accordance with one or more of the personal data processing conditions specified in Article 5 of the Law on the Protection of Personal Data. These processing activities are carried out in compliance with the general principles specified in Article 4 regarding the processing of personal data, the general principles outlined in the Law, and all obligations regulated in the Law, with a focus on the personal data owners covered by this Policy (Individuals Receiving Products and Services, Employees, Employee Candidates, Visitors, Supplier Employees, Supplier Representatives, Shareholders/Partners, Relatives of Employees, Relatives of Employee Candidates, Dependents, Persons to be Contacted in Emergencies, Consultants, Trainers, and Reference Persons) within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of Law No. 6698 in order to:

- Fulfill the requirements of commercial activities conducted by our company and to ensure that relevant individuals benefit from the products and services offered by our company,
- Carry out the necessary work by our company's relevant business units and to manage related business processes and reporting,
- Determine our company's commercial, operational business strategies, and appropriate services,
- Evaluate requests and complaints,
- Ensure that our company's activities are carried out in accordance with the company procedures or relevant legislation,
- Execute the works conducted with our business partners in sectors that have different needs and to manage reference relationships,
- Fulfill the information sharing, reporting, and informing obligations required by public institutions and authorities,
- Fulfill the information and document retention obligations arising from legal regulations,
- Manage our financial, communication, market research, and purchasing operations,
- Manage our legal processes and to provide better and uninterrupted service,

MYD Endüstriyel has created a personal data inventory in accordance with the Data Controllers Registry Regulation issued by the Personal Data Protection Authority. This data inventory includes data categories, data sources, data processing purposes, data processing processes, the recipient groups to whom the data is transferred, and retention periods.

In this context, **MYD Industrial** includes, but is not limited to, the following types of data categories;

Identity Information

Information written on your identity card, including but not limited to your name, surname, mother's name, father's name, place of birth, date of birth, marital status, religion, blood type, and the province, district, and neighborhood where



PROCESSING AND PROTECTION OF PERSONAL DATA POLICY

DOC.NO	MYDE.04.02
REV.NO	01
DATE OF ISSUE	08.12.2019
REV.DATE	06.06.2024
PAGE NO	5 / 11

	you are registered.
Contact Information	Communication data requested from you or provided by you to establish contact, such as home phone number, mobile phone number, residential address or other address information, and email address.
Personal Data	<ul style="list-style-type: none">• Copy of identity card,• Population registry copy,• Certificate of residence,• Health report,• Copy of Diploma• Criminal record,• Passport-size photo,• Document indicating family status,• Military service status document,• Employment Contract / Service Contract,• Social Security Institution employment entry declaration,• Your criminal record (background check),• Information and documents related to your health status.
Professional Experience	<ul style="list-style-type: none">• Diploma information, attended courses, in-service training information, certificates, etc.
Bank Account Information (Finance)	<ul style="list-style-type: none">• Bank account number, IBAN number, other information related to the bank card.
Transaction Security:	<ul style="list-style-type: none">• IP address information, website entry and exit information, password and passcode information, etc
Curriculum Vitae Information	<ul style="list-style-type: none">• Education information stated in your CV or requested by MYD Endüstriyel or provided by you, school information related to your education, certificate information, education status, and information about your education,• Information regarding the place, date, and duration of your work experience as stated in your CV or requested by MYD Endüstriyel or provided by you, information related to your previous jobs and duties, all kinds of information regarding your work experiences,



PROCESSING AND PROTECTION OF PERSONAL DATA POLICY

DOC.NO	MYDE.04.02
REV.NO	01
DATE OF ISSUE	08.12.2019
REV.DATE	06.06.2024
PAGE NO	6 / 11

	<ul style="list-style-type: none">Your photograph as stated in your CV or requested by MYD Endüstriyel or provided by you,Your driver's license and the information written on it as stated in your CV or requested by MYD Endüstriyel or provided by you,Your references and information related to them as stated in your CV or requested by MYD Endüstriyel or provided by you
Health Data	<ul style="list-style-type: none">All health information and data obtained when creating a personal file (information related to disability status, blood type information, personal health information)
Criminal Conviction Data	<ul style="list-style-type: none">Criminal record information obtained when creating a personal file.
Customer Transaction	<ul style="list-style-type: none">Information such as invoice, promissory note, check information, information on teller receipts, order information, request information.
Legal Transaction	<ul style="list-style-type: none">Information in correspondence with judicial authorities, information in case files, etc.,
Marketing	<ul style="list-style-type: none">Past service information, surveys, cookie records, information obtained from campaign activities,
Visual and Auditory Records	<ul style="list-style-type: none">Visual and auditory recordings,
Location	<ul style="list-style-type: none">Location information of where you are,
Other	<ul style="list-style-type: none">Information such as the education status of an employee's relative in the AGI process, the signature on the signature circular, smoking information in the CV, height and weight information, and vehicle license plate information in the visitor's book.

7. GENERAL PRINCIPLES RELATING TO THE PROCESSING OF PERSONAL DATA

7.1. Compliance with the Law



PROCESSING AND PROTECTION OF PERSONAL DATA POLICY

DOC.NO	MYDE.04.02
REV.NO	01
DATE OF ISSUE	08.12.2019
REV.DATE	06.06.2024
PAGE NO	7 / 11

Our company carries out personal data processing activities in accordance with the law and the rules of good faith, primarily the Constitution, the Personal Data Protection Law, and relevant legislation. In this context, our company identifies the legal grounds that necessitate the processing of personal data, considers the requirements of proportionality, does not use personal data other than the required purposes and does not process without the knowledge of the individuals concerned.

7.2. Ensuring the Accuracy and, When Necessary, the Timeliness of the Data

Our company ensures that the personal data it processes is accurate and up-to-date, taking into account the fundamental rights of the data owners and its own legitimate interests. In this context, efforts are made to keep data up-to-date, and all kinds of necessary administrative and technical measures are taken to ensure its accuracy and timeliness.

7.3. Specific, Legitimate, and Clear Purpose

Our company processes personal data solely for clear and precisely determined legitimate purposes and does not engage in data processing activities other than these purposes. The purpose of personal data processing is determined before the processing activity and is recorded in the "**Personal Data Inventory.**"

7.4. Data Being Relevant, Limited, and Proportionate to the Purpose of Processing

Our company processes personal data only to the extent necessary to achieve the purposes identified. Data processing activities are not carried out on the assumption that it may be needed in the future. In this context, processes are constantly reviewed, and the principle of **reducing personal data** is implemented.

7.5. Retaining Personal Data for the Necessary Period and Then Deleting It

Our company retains personal data only for the period specified in the relevant legislation or as long as it is necessary for the purpose for which they were processed. In this context, our company first determines whether a retention period is stipulated in the relevant legislation, If such period is specified, it acts in accordance with this period, takes into account the periods of legal and criminal statute of limitations, and retains personal data only for as long as necessary for the purpose for which they were processed. In case the period expires or the reasons requiring processing are eliminated, personal data is deleted, destroyed, or anonymized according to our company's "Data Destruction Policy."

8. CONDITIONS FOR PROCESSING PERSONAL DATA

Personal data can only be collected, processed, or used within the scope of the legal grounds specified below:

8.1. Explicit Consent

Explicit consent is defined in Article 3 of the Law as "consent that relates to a specific subject, is based on information, and is expressed with free will." Additionally, in Article 20, paragraph 3 of the Constitution, it is stipulated that personal data can only be processed in cases provided for by law or with the explicit consent of the individual. Explicit consent is foreseen in the Personal Data Protection Law No. 6698 as the fundamental legal basis for processing both special personal data and non-special personal data.



PROCESSING AND PROTECTION OF PERSONAL DATA POLICY

DOC.NO	MYDE.04.02
REV.NO	01
DATE OF ISSUE	08.12.2019
REV.DATE	06.06.2024
PAGE NO	8 / 11

In accordance with this, our company processes personal data by obtaining explicit consents that are freely expressed and can be proven (written, electronic, or recorded orally). When necessary, explicit consents for processing sensitive personal data will be obtained in writing.

Process managers who process personal data are responsible for ensuring the existence and validity of the explicit consent of the data owner when collecting personal data. If it is determined that there is no explicit consent (except in the exceptions listed below), data processing activities will not be conducted.

8.2. Processing Personal Data Without Explicit Consent

Personal data may be processed without explicit consent in the presence of any of the following conditions:

- 8.2.1 The processing is expressly provided for by law,
- 8.2.2 It is necessary to protect the life or physical integrity of the person or another person who is unable to express consent due to actual impossibility or whose consent is not legally valid,
- 8.2.3 The processing of personal data of the parties to a contract is necessary, provided that it is directly related to the establishment or performance of the contract,
- 8.2.4 It is necessary to fulfill a legal obligation of the data controller,
- 8.2.5 The data is made public by the data owner themselves,
- 8.2.6 Processing is necessary for the establishment, exercise, or protection of a right,
- 8.2.7 Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data owner.

9. TRANSFER OF PERSONAL DATA

Your personal data is processed by our company in accordance with the law and rules of good faith, accurately and, when necessary, up-to-date, for specified, clear, and legitimate purposes, in a manner relevant, limited, and proportionate to the purpose for which they are processed, and for as long as required by relevant legislation or the purpose for which they are processed.

Your personal data may be transferred domestically and/or abroad to our business partners with whom we cooperate to continue our company's activities and business processes, our company's shareholders, suppliers, insurance companies, notaries, banks and financial institutions, consulting firms from which we receive support in areas such as law, financial consulting, taxation, etc., legally authorized public institutions and private individuals, and service providers from whom we receive support in areas such as storage, archiving, IT support (server, hosting, software, cloud computing, etc.), within the framework of the personal data processing conditions specified in Articles 8 and 9 of Law No. 6698 and for the above-mentioned purposes.

9 RIGHTS OF DATA SUBJECTS

9.1 **MYD Endüstriyel** will respond within 30 days to requests from data subjects whose personal data it processes, concerning the following rights:

- (1) To learn whether personal data has been processed,



PROCESSING AND PROTECTION OF PERSONAL DATA POLICY

DOC.NO	MYDE.04.02
REV.NO	01
DATE OF ISSUE	08.12.2019
REV.DATE	06.06.2024
PAGE NO	9 / 11

- (2) To request information regarding the processing of personal data,
- (3) To learn the purpose of the personal data processing and whether they are used in accordance with that purpose,
- (4) To know the third parties to whom personal data is transferred, domestically or abroad,
- (5) To request the correction of personal data in case of incomplete or incorrect processing and to request notification of the corrections made within this scope to the third parties to whom personal data was transferred,
- (6) To request the deletion or destruction of personal data if the reasons for processing no longer exist, even if it has been processed in accordance with the provisions of KVK Law and other relevant laws, and to request notification of this action made within this scope to the third parties to whom personal data was transferred,
- (7) To object to the emergence of any adverse result arising from the analysis of processed data exclusively through automated systems,
- (8) To request compensation for damages due to unlawful processing of the personal data.

9.2 Data subjects may submit their requests within the scope of the rights specified above by providing the necessary identification information and documentation, through the methods specified below or by using the KVKK form available on the website, or through other methods determined by the Personal Data Protection Board.

10 CONFIDENTIALITY AND DATA SECURITY MEASURES;

All personal data processed within **MYD Endüstriyel** is confidential, and the necessary technical and administrative measures are taken to ensure an appropriate level of security, as specified in Article 12 of the Law:

- a) To prevent the unlawful processing of personal data,
- b) To prevent the unlawful access to personal data,
- c) To ensure the safe retention of personal data.

10.1 Technical Measures to Ensure Lawful Processing of Personal Data and Prevent Unlawful Access to Personal Data

MYD Endüstriyel has implemented all kinds of technical and technological security measures to protect your personal data against potential risks. For example:

- Network security and application security are ensured.
- Access logs are kept regularly.
- Authorizations for employees who change their duties or leave the company are revoked.
- Up-to-date antivirus systems are used.
- Firewalls are used.
- Personal data security is monitored.



PROCESSING AND PROTECTION OF PERSONAL DATA POLICY

DOC.NO	MYDE.04.02
REV.NO	01
DATE OF ISSUE	08.12.2019
REV.DATE	06.06.2024
PAGE NO	10 / 11

- Necessary security measures are taken concerning entry and exit to physical environments containing personal data.
- Security is provided for physical environments containing personal data against external risks (e.g., fire, flood).
- Security is ensured for environments where personal data is stored.
- Personal data is minimized as much as possible.
- Personal data is backed up, and the security of the backups is ensured.
- User account management and authority control systems are implemented, and their monitoring is carried out as well.
- Log records are kept in a way that prevents user intervention.
- Data encryption is applied.

10.2 Administrative Measures to Ensure Lawful Processing of Personal Data and Prevent Unlawful Access to Personal Data

- A management framework has been established to initiate and control information security operations and practices within the organization.
 - a. KVKK Committee and a contact person have been appointed, and their job descriptions have been determined.
 - b. KVKK Application channels have been determined.
 - c. Breach, request/complaint management workflows have been determined.
- The Main Principles, policies, and procedures for processing and protection of personal data have been determined.
 - a. Data Processing and Retention Policy has been established.
 - b. Personal Data Processing and Protection Policy has been established.
 - c. Policy for the Security of Special Personal Data has been established.
- The existing risks and threats within the scope of processed personal data have been identified.
- Training and awareness programs are provided to employees on personal data security.
- The roles, responsibilities, and job descriptions regarding data security have been defined to ensure that employees and contractors are aware of and fulfill their information security responsibilities.
- Confidentiality agreements are made.
- An information notice has been published for employees, customers, suppliers, etc.
- Processes requiring explicit consent have been identified and implemented.
- Regular and/or random internal audits are conducted. Vulnerabilities in confidentiality and security that emerge as a result of audits are addressed.
- The necessity of the personal data in question is evaluated in terms of the purpose of processing, and personal data is reduced as much as possible.
- In case the personal data is obtained illegally by others, necessary measures are taken by the employees to notify the relevant individual and the Board as soon as possible.



PROCESSING AND PROTECTION OF PERSONAL DATA POLICY

DOC.NO	MYDE.04.02
REV.NO	01
DATE OF ISSUE	08.12.2019
REV.DATE	06.06.2024
PAGE NO	11 / 11

10.3 Measures to Be Taken in Case of Unlawful Disclosure of Personal Data

In the event that processed personal data is obtained by others through unlawful means, our company will notify the relevant data subject and the Board as soon as possible (within a maximum of 72 hours).

11 CONDITIONS FOR THE DESTRUCTION (DELETION, DISPOSAL, AND ANONYMIZATION) OF PERSONAL DATA

In accordance with Article 138 of the Turkish Penal Code, Article 7 of the Data Protection Law, and the "Regulation on the Deletion, Disposal, and Anonymization of Personal Data" issued by the Authority, even if personal data is processed in compliance with the relevant legal provisions, **MYD Endüstriyel** will delete, destroy, or anonymize the personal data in case the reasons requiring processing are eliminated, either with its own decision or upon the request of the data subject. **MYD Endüstriyel** has established a policy in accordance with the provisions of this regulation on this issue, and in accordance with this policy, destruction is carried out according to the nature of the data. In accordance with this regulation, **MYD Endüstriyel** has determined periodic destruction dates and has established a calendar for periodic destruction to be carried out at various intervals with the commencement of the obligation.

12 ENFORCEMENT

A management structure has been established by **MYD Endüstriyel** to ensure compliance with the regulations of the Data Protection Law in the execution of this Policy.

13 EFFECTIVE DATE OF THE POLICY

This Policy came into effect on **08.12.2019** and was updated on **06.06.2024**.