

PUBLIC DISCLOSURE CONCERNING THE PROTECTION OF PERSONAL DATA

The protection of basic human rights and freedoms—including but not limited to the protection of privacy, personal information security and protection, and respect for ethical values—is a principle of the utmost priority for Çolakoğlu Metalurji A.Ş. In line with this, our company processes all personal information pertaining to natural persons- including but not limited to those who avail themselves of its products and services- in accordance with the requirements of the Protection of Personal Data Act (Statute 6698), and protects this information by taking the administrative and technical measures specified in the guides published by Personal Data Protection Authority.

Types of Personal Data Processed

Your personal data in the following categories are collected and processed verbally and in writing physically and/or electronically within the framework of your relationship with the Company:

- Your personally identifiable information (full name, the Republic of Turkey identification number, date and place of birth, marital status, driver's license information, passport information);
- Your contact information (address number, e-mail address, contact address, Registered e-mail address [KEP]), phone number, immediate family member contact information);
- Your location data (location in the company headquarters or plant);
- Personnel information (background information, payroll information, certificate of employment, fringe benefits information);
- Application information (CV, application photo);
- Professional experience (degree information, vocational education information, certificates, internal training);
- Conviction and security measures (information on conviction);
- Union membership information;
- Legal action (information in correspondence with judicial authorities, information in the case file);
- Customer transaction (invoice, check information, order information, request information, satisfaction surveys);
- Physical space security (entry and exit records of employees and visitors, surveillance footage recorded in our plant and headquarters for security purposes);
- Process security (password information);
- Risk management (information processes to manage commercial, technical, and administrative risks);
- Financial information (bank account details);
- Visual and audio recordings (videos and photographs of corporate events);
- Medical information (disability, blood type, personal health records).



Purposes of Personal Data Processing

According to the PPDA, printed and electronic-format copies of your personal data may be processed automatically or, on condition that it be an element of a data-recording system of any kind, by non-automatic means in order to fulfill our legally or contractually-mandated responsibilities associated with:

- Providing/procuring any products and services that are provided/procured by our company or by any affiliate or subsidiary which is directly or indirectly associated with our company (any member of the Çolakoğlu® Group of Companies) and to carry out such operations as may be required for this;
- Increasing customer satisfaction with the products and services offered by our company and, for that purpose having electronic and/or physical surveys conducted and market analyses performed by contractors;
- Engaging in communication and marketing activities with our customers and suppliers;
- Providing product/service sales and after- sales support services;
- Carrying out commercial and logistical operations;
- Ensuring the legal and commercial security of our company, of members of the Çolakoğlu® Group of Companies, and/or of any person that is in a business relationship with our company;
- Managing reputational research processes, auditing, and legal-compliance processes;
- Ensuring and overseeing the physical security of any premises that belong to our company;
- Managing goods and/or services purchasing and supply-chain processes;
- Conducting control and risk management operations associated with our supplier and customer-recognition procedures;
- Conducting financing and accounting operations;
- Carrying out Occupational Health and Safety activities;
- Event management;
- Managing prospective-employee application and assessment processes;
- Carrying out payroll and fringe benefits processes for employees, and monitoring other obligations arising from employment contracts and the legislation;
- Carrying out talent and career development activities and internal training activities;
- Planning and executing information system and information security processes;
- Ensuring business continuity;
- Engaging in social-responsibility, civil-society, and sponsorship activities;
- Ensuring that information that is associated with operations that have legal, technical, or administrative consequences is correct and up to date;
- Adhering to company principles and policies.

Conveying Your Personal Data to Others

Subject to the provisions of PPDA and other applicable laws, regulations, and administrative provisions, Çolakoğlu® may, for the purposes set out above, convey your personal data (make your personal data available) to the following individuals and organizations:

- The company's direct or indirect shareholders, affiliates, or subsidiaries;
- Suppliers, individuals and organizations from which it obtains consultancy services; legally - authorized public agencies and organizations, legally - authorized private individuals.



Methods of And Valid Legal Reasons for Collecting Personal Data

Your personal data may be collected in any manner or form, be it written, verbal, electronic, or otherwise, from our company's units, from group companies with which our company has business dealings, from websites, from social media channels, from third parties, and from legally - authorized agencies and organizations.

In connection with and constrained by the legitimate purposes explicitly stated above, our company may collect, use, record, and process personal data about you in accordance with the requirements of law, the tenets of good faith, and the principle of proportionality. Whenever it does so it will provide you with clear and understandable notification to this effect and, when required, it will obtain your express consent as well.

As stipulated in PPDA article 5/2, personal data may be processed and made accessible to the individuals and organizations indicated above in situations where

- doing so is explicitly allowed by law or
- doing so is essential in order to protect the life or physical wellbeing of the data owner or of any other person who is physically incapable of giving consent or whose consent is not deemed to be legally valid or
- provided that it be directly related to the establishment or execution of a contract, the processing of personal data of the contractual parties is made necessary by that contract or
- the data controller must do so in order to fulfill their legal responsibilities or
- the data owner has already made the data public themselves or
- processing the data is essential in order to establish, exercise, or protect a right or
- on condition that it shall not be detrimental to the fundamental rights and liberties of the data owner, the data needs to be processed for the sake of the legitimate interests of the data controller.

Personal Data Retention Periods

When deciding how long your personal data is to be retained, consideration is given to the requirements of laws and regulations. Subject to those constraints, we may determine what retention periods are necessary in order to achieve the purposes for which the data is being processed. When the reason for processing your personal data no longer exists and, provided that there are no other legal reasons or grounds for retaining that data, your personal data will be erased, eradicated, or anonymized.

In situations where the reason for processing your personal data no longer exists or legally-mandated or company-defined retention periods have expired, your data may be retained only if it might serve as evidence in potential legal disputes or if it might be used to assert or defend a right associated with the data. When determining retention periods in these situations, consideration is given to statutes of limitations applicable to the assertion of such rights but, based on examples of claims over the same issues with which the company has previously had to contend, the company may decide to retain the data for a period of time longer than that. In this case however, the personal data will not be accessed for any reason other than that of making use of pertinent information in the course of litigation. Once this period has run its course however, your personal data will be erased, eradicated, or anonymized.



The Rights of Data Owners

Under Article 11 of the PPDA, you have the right to apply to our company in order to:

- to learn whether your personal data are processed or not,
- to request information if your personal data are processed,
- to learn the purpose of your data processing and whether this data is used for intended purposes,
- to know the third parties to whom your personal data is transferred at home or abroad,
- to demand that corrections be made in any processed personal data that is incomplete or incorrect and, in such cases, also demand that any third parties to whom their personal data may have been transferred be notified of such corrections,
- to demand, even in situations where personal data has been processed in accordance with the provisions of PPDA or other laws, that such personal data be erased or eradicated if the reasons for its processing no longer exist and, in such cases, also demand that any third parties to whom their personal data may have been transferred be notified of such actions,
- to object to the processing, exclusively by automatic means, of your personal data, which leads to an unfavourable consequence,
- to request compensation for the damage arising from the unlawful processing of your personal data.

If you wish to exercise any of your rights indicated above, you should obtain a copy of a PERSONAL DATA PROTECTION ACT REQUEST FORM from our website at www.colakoglu.com.tr, fill it out indicating how you are exercising your rights under Article 11 of the PPDA, sign it, and submit it along with proof of your identity in one of the following ways:

- You may deliver it in person or have it sent through a notary public to the company's **Rüzgarlıbahçe Mahallesi Çam Pınarı Sokak No:1 İç Kapı No:16 Beykoz, İstanbul, Turkey** address;
- You may send it electronically, in which case the form should be printed, filled out, and forwarded by you to colakoglumetalurji@hs02.kep.tr or to colakoglu@colakoglu.com.tr using a registered electronic mail address (registered email), a secure electronic signature, a mobile signature, or an email address which you have already declared to our company and which has been registered by our company.

To ensure that your requests are effectively responded to, we recommend that you be clear and exact when providing information and that you also include dates whenever possible.

Data Controller:

Çolakoğlu® Metalurji A.Ş.

İstanbul Trade Registry Office – 99002

Rüzgarlıbahçe Mahallesi Çam Pınarı Sokak No:1 İç Kapı No:16 Beykoz, İstanbul, Turkey

Website: www.colakoglu.com.tr

