

ÇOLAKOĞLU METALURJİ ANONİM ŞİRKETİ

CALL CENTER PRIVACY NOTICE

This Privacy Notice has been prepared by Çolakoğlu Metalurji Anonim Şirketi (the “Company”), acting as the data controller, for the purpose of fulfilling its obligation to inform data subjects pursuant to Article 10 of Law No. 6698 on the Protection of Personal Data (the “KVKK”) in relation to the processing of personal data obtained through the call center.

1. IDENTITY OF THE DATA CONTROLLER

Your personal data are processed by Çolakoğlu Metalurji Anonim Şirketi in its capacity as the data controller. The Company’s contact details are as follows:

Company Name: Çolakoğlu Metalurji Anonim Şirketi

MERSIS No.: 0260007425800015

Trade Registry No.: 99002-0

Address: Rüzgarlıbahçe Mah. Çam Pınarı Sk. No: 1 İç Kapı No: 16, Beykoz / İstanbul

Telephone: 444 26 27

E-mail: kvkk@colakoglu.com.tr

KEP (Registered Electronic Mail): colakoglumetalurji@hs02.kep.tr

Website: <https://www.colakoglu.com.tr/>

Application Form: Data Subject Application Form available at <https://www.colakoglu.com.tr/>

2. PERSONAL DATA PROCESSED, PURPOSES OF PROCESSING AND LEGAL BASIS

Within the scope of the call center operations, personal data relating to two different groups of data subjects are processed: (i) customers/third parties contacting the call center, and (ii) employees conducting the calls. The personal data processing activities relating to each group are separately set out below.

2.1. Personal Data Processing Activities Relating to Customers/Third Parties

When you contact our call center to submit a request or complaint or to obtain information about our services, your personal data may be processed. The legal basis and purposes for processing such personal data are set out below.

a) Data Processed for Compliance with Legal Obligations and Performance of a Contract

For the purpose of fulfilling the obligations stipulated under Law No. 6502 on Consumer Protection, the Regulation on After-Sales Services, Turkish Commercial Code No. 6102, Turkish Code of Obligations No. 6098, and other applicable legislation, the personal data listed

below are processed pursuant to Article 5/2-c of the KVKK, on the legal basis that the processing is necessary for the establishment or performance of a contract:

- Full name, Turkish ID number (passport number for foreign customers), place and date of birth, address, telephone number and e-mail address: for the purposes of verifying the customer's identity and carrying out information security processes.
- Order, quotation and product information (*product type, product code, quantity, quality/specification information, delivery information, order and shipment information*) are processed for the purposes of receiving and evaluating requests, applications and complaints submitted through the call center, carrying out product sales processes, and responding to post-sales support and customer requests.
- Data relating to the content of requests and complaints are processed for the purposes of receiving, evaluating and resolving applications submitted through the call center, ensuring customer satisfaction, providing support regarding purchased products and services, and carrying out after-sales service processes.

b) Data Processed for the Establishment, Exercise or Protection of a Right

The personal data listed below are processed pursuant to Article 5/2-e of the KVKK, on the legal basis that processing is necessary for the establishment, exercise or protection of a right:

- Call recordings (audio data) are processed for the purposes of resolving disputes that may arise in relation to the provision of services, using such recordings as evidence in consumer complaints, arbitration or judicial proceedings, establishing and exercising legal claims, and protecting the Company's legal rights and interests.

c) Data Processed on the Basis of Legitimate Interests

The personal data listed below are processed pursuant to Article 5/2-f of the KVKK, on the legal basis that processing is necessary for the legitimate interests of the data controller:

- Full name, address, telephone number and e-mail address are processed for the purposes of ensuring the efficient operation of call center processes, improving operational communication, coordinating business processes, and effectively managing processes relating to customer requests.
- Call recordings (audio data) are processed for the purposes of monitoring service quality, assessing compliance with call quality standards, conducting employee training and performance evaluation processes, and resolving disputes and creating evidence where necessary.

2.2. Personal Data Processing Activities Relating to Employees

The personal data of employees conducting call center conversations are also processed within the scope of the recorded calls. The personal data processed, the applicable legal bases and the purposes of processing are set out below.

a) Data Processed for the Performance of the Employment Contract

For the purpose of fulfilling the obligations arising under Labour Law No. 4857, Turkish Code of Obligations No. 6098 and other applicable legislation, the personal data listed below are processed pursuant to Article 5/2-c of the KVKK, on the legal basis that processing is necessary for the establishment or performance of a contract:

- Full name, extension number, e-mail address and employee identification information are processed for the purposes of assigning call center duties, verifying employee identity and coordinating business processes.
- Employment-related information (working hours, records relating to performance of employment duties) is processed for the purposes of fulfilling obligations arising from the employment contract, providing call center services and carrying out operational processes.

b) Data Processed for the Establishment, Exercise or Protection of a Right

The personal data listed below are processed pursuant to **Article 5/2-e of the KVKK**, on the legal basis that processing is necessary for the establishment, exercise or protection of a right:

- **Call recordings (audio data)** are processed for the purposes of resolving disputes that may arise between employees and the workplace, creating evidence in court, arbitration or administrative proceedings, conducting disciplinary processes in compliance with applicable law, and establishing and protecting the Company's rights.

c) Data Processed on the Basis of Legitimate Interests

The personal data listed below are processed pursuant to Article 5/2-f of the KVKK, on the legal basis that processing is necessary for the legitimate interests of the data controller. The processing activities carried out within this scope are proportionate to the fundamental rights and freedoms of employees and are limited to what is necessary:

- Call recordings (audio data) are processed for the purposes of ensuring service quality and compliance with quality standards, identifying employees' training needs, conducting performance evaluation processes, and improving call center processes.

3. PURPOSES OF TRANSFER OF PERSONAL DATA AND RECIPIENT GROUPS

Your personal data may be transferred to the following recipient groups, within or outside Türkiye, in accordance with the provisions governing the transfer of personal data under Articles 8 and 9 of the KVKK, and only to the extent necessary, limited and proportionate to the purposes specified in this Privacy Notice:

- For the purposes of providing the telecommunications, switchboard systems and technical infrastructure necessary for the operation of the call center services, supporting the data controller's legitimate interests and ensuring the continuity of operational

processes, to our group company, BİL-TİM BİLGİSAYAR HİZMETLERİ ANONİM ŞİRKETİ;

- For the purposes of fulfilling obligations arising from applicable legislation, responding to requests for information and documents from authorized public institutions, organizations and administrative authorities, and conducting legal proceedings, to public institutions and organizations and administrative authorities duly authorized by law;
- For the purposes of obtaining legal and financial advisory services, monitoring contractual and legal processes, managing disputes and ensuring compliance with applicable legislation, to natural and legal persons providing legal, financial and technical advisory services (*including lawyers, certified public accountants and other similar advisors*).

4. METHOD OF COLLECTION OF PERSONAL DATA

Your personal data are collected by our Company electronically through call center systems (*call management systems, CRM applications, call recording systems*), human resources systems, intranet applications, electronic mail and online platforms, either automatically or, where they form part of a data recording system, by non-automatic means.

5. YOUR RIGHTS AS A DATA SUBJECT UNDER THE KVKK

You may submit your requests regarding your personal data and your rights under Article 11 of the KVKK to the Company in accordance with the Communiqué on the Procedures and Principles of Application to the Data Controller, in writing or via registered electronic mail (KEP), secure electronic signature, mobile signature, or by using the e-mail address previously notified by you to the Company and registered in the Company's systems, through the contact details set out below:

Company Name: Çolakoğlu Metalurji Anonim Şirketi

MERSIS No.: 0260007425800015

Trade Registry No.: 99002-0

Address: Rüzgarlıbahçe Mah. Çam Pınarı Sk. No: 1 İç Kapı No: 16, Beykoz / İstanbul

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