

PROTECTION OF PERSONAL DATA

INFORMATION TEXT ON THE PROTECTION OF PERSONAL DATA

Scope

As Organik Kimya Group Companies;

- Organik Kimya Sanayi ve Ticaret A.Ş.
- Orgachem Kimya Sanayi ve Ticaret A.Ş.
- İntur İnşaat Nakliyat Turizm Anonim Şirketi
- Elkasan Kimyevi Maddeler Pazarlama Anonim Şirketi

(will be mentioned as "Organik Group Companies")

we show maximum sensitivity to the security of your personal data. With this awareness, we attach great importance to the processing and preservation of all personal data of all our employees in accordance with the Law on the Protection of Personal Data No. 6698 ("Law"). Organik Group Companies presents the following explanations to the attention of our employees in order to fulfill its obligation arising from the relevant Law, as the "Data Controller" defined in the Law.

1) Purposes of Processing Personal Data and Collection Methods

Organik Group Companies personal data (identity, communication, location, personnel, legal action, physical space security, transaction security, risk management, professional experience, audio/visual records, health information, religious belief, criminal conviction and security measures, bank account information, visual biometric data, financial information) are processed for the following purposes:

- Execution of Emergency Management Processes
- Execution of Information Security Processes
- Fulfillment of Employment Contract and Legislative Obligations for Employees
- Execution of Benefits and Benefits Processes for Employees
- Execution of Audit / Ethical Activities
- Execution of Training Activities
- Execution of Access Authorizations
- Execution of Activities in Compliance with the Legislation
- Execution of Finance and Accounting Affairs
- Ensuring Physical Space Security
- Execution of Assignment Processes
- Follow-up and Execution of Legal Affairs
- Planning of Human Resources Processes
- Execution of Occupational Health / Safety Activities
- Receiving and Evaluating Suggestions for Improvement of Business Processes
- Execution of Goods / Services Procurement Processes
- Execution of Goods / Services After-Sales Support Services
- Execution of Goods / Services Sales Processes



- Execution of Activities for Customer Satisfaction
 - Execution of Marketing Analysis Studies
 - Execution of Performance Evaluation Processes
 - Execution of Risk Management Processes
 - Execution of Contract Processes
 - Follow-up of Requests / Complaints
 - Keeping Facility Entry and Exit Under Control
 - Execution of Supply Chain Management Processes
 - Execution of Wage Policy
 - Ensuring the Security of Data Controller Operations
 - Execution of Talent / Career Development Activities
 - Providing Information to Authorized Persons, Institutions and Organizations
 - Execution of Management Activities
 - Creating and Tracking Visitor Records
 - R&D Applications and R&D Incentive Applications
- Organizing in-house motivational activities (such as sending congratulatory messages and/or gifts on special days or anniversaries)

Your personal data is collected orally, in writing or electronically, by automatic or nonautomatic methods (for example, the forms you fill during your job application and employment procedures, the information and documents you submit or explain to us). The personal data in question will be processed by taking all necessary information security measures and will be stored and preserved by being transferred to physical archives and information systems during the legal retention period or as long as the processing purpose necessitates. Relevant personal data will be destroyed, destroyed or anonymized by Organik Group Companies at the end of the period required by the purpose of processing. Private health insurance for family members, AGI, etc. Personal data belonging to your family members may also be processed by the Company and shared with third parties (for example, insurance companies) in order to provide various financial support and to communicate in an emergency.

2) Persons and Purposes of Transfer of Personal Data

Employee personal data processed by Organik Group Companies may be shared with the following third parties in order to carry out operational processes, fulfill legal obligations, provide reporting and information when necessary, perform payroll and fringe benefits transactions, and provide security measures:

- CPA and third parties who provide consultancy services to the extent required within the scope of our obligations pursuant to tax, SSI and relevant legislation, to the extent necessary,
- Other domestic and foreign service providers that support us in data processing, executing the human resources process, regulating fringe benefits and biometric face recognition systems,
- Relevant insurance companies for the regulation of fringe benefits and health insurance,

- Legally authorized public institutions and organizations,
- The security company from which service is received, and the courier company from which service is received for the cargoes to be sent to the employees,
- All other natural and legal persons for whom we have obtained your consent for personal data transfer, both at home and abroad.
- Limited with auditors and consultants due to transfer,
- With our business partners and group companies

Necessary technical and legal measures are taken to prevent violations of rights during data transfer to third parties, and it is followed that legal protection will take place both within the scope of Organik Group Companies and the third party to whom the data is transferred.

3) Method and Legal Reasons for Processing Personal Data

Personal data processed by Organik Group Companies may be processed for the purposes specified in the section titled "Purposes of Processing Your Personal Data" above and based on the following legal grounds in the Law:

- Prediction of data processing in legislation (for example, keeping criminal records of some of our employees in accordance with YYS legislation)
- It is necessary to process the personal data of the contract parties, provided that it is necessary for the establishment and performance of the contracts we are a party to (for example, the processing of your personal data that needs to be processed within the scope of the performance of your employment contract)
- Being compulsory for us to fulfill our legal obligations (especially regarding our commercial and administrative activities, in order to fulfill our obligations arising from the current trade, business, tax and SSI legislation)
- It is necessary for us to process data for the establishment, exercise or protection of a right (for example, the processing of personal information necessary for the establishment of the fringe rights provided to you)
- Provided that it does not harm your rights and fundamental freedoms, data processing is mandatory for our legitimate interests (for example, within the scope of personnel training activities, sharing the data of the employees who will participate in the training with the companies from which the service is received, processing the entry-exit dates and times to the facility via the card system)
- It is compulsory for the protection of life or physical integrity of the person or another person who is unable to express his consent due to actual impossibility or whose consent is not legally valid (for example, processing health data of people who are unable to express their consent in case of an accident at the company's facilities)
- Fulfilling the legal obligation of the data controller (for example, keeping your personal information in your personal file in accordance with the labor legislation)
- Processing of your health data by workplace physicians who are under the obligation to keep professional secrecy.
- Obtaining your explicit consent in cases outside the scope of the above-mentioned exceptions.



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(Processing your visual biometric data within the scope of physical space security and occupational health and safety practices)

These data can be communicated to our company verbally and in writing, as well as provided within the scope of your personal file and/or can be obtained from official and corporate organizations within the scope of company activities. The aforementioned data is stored both in physically locked areas and in digital systems with closed circuit protection and all kinds of security measures.

4) Rights of Personal Data Owner

Within the scope of the law, you are granted the following rights as a personal data owner:

- Learning whether your personal data is processed or not,
- If your personal data has been processed, requesting information about it,
- To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- Knowing the third parties to whom your personal data is transferred, in the country or abroad,
- Requesting correction of your personal data in case of incomplete or incorrect processing and requesting notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,
- Requesting the deletion or destruction of your personal data in the event that the reasons requiring processing are eliminated, although it has been processed in accordance with the provisions of the law and other relevant laws, and requesting the notification of the transaction made within this scope to the third parties to whom your personal data has been transferred,
- Objecting to the emergence of a result against you by analyzing your processed data exclusively through automated systems,
- Requesting the compensation of the damage in case you suffer damage due to unlawful processing of your personal data.

You can submit your requests in writing to the Risk Management and Compliance department to obtain more information about the compliance and policies of Organik Group Companies regarding the Law and other applicable legislation and to exercise your above-mentioned rights.

In your application;

- Name surname
- If the application is in writing, signature
- For citizens of the Republic of Turkey, T.R. identity number, nationality for foreigners, passport number or identification number, if any
- Domicile or workplace address for notification,
- The e-mail address, telephone and fax number for notification, if any,
- Demand

information is required. In addition, as the data owner, you must attach the information and documents related to your request to your application.



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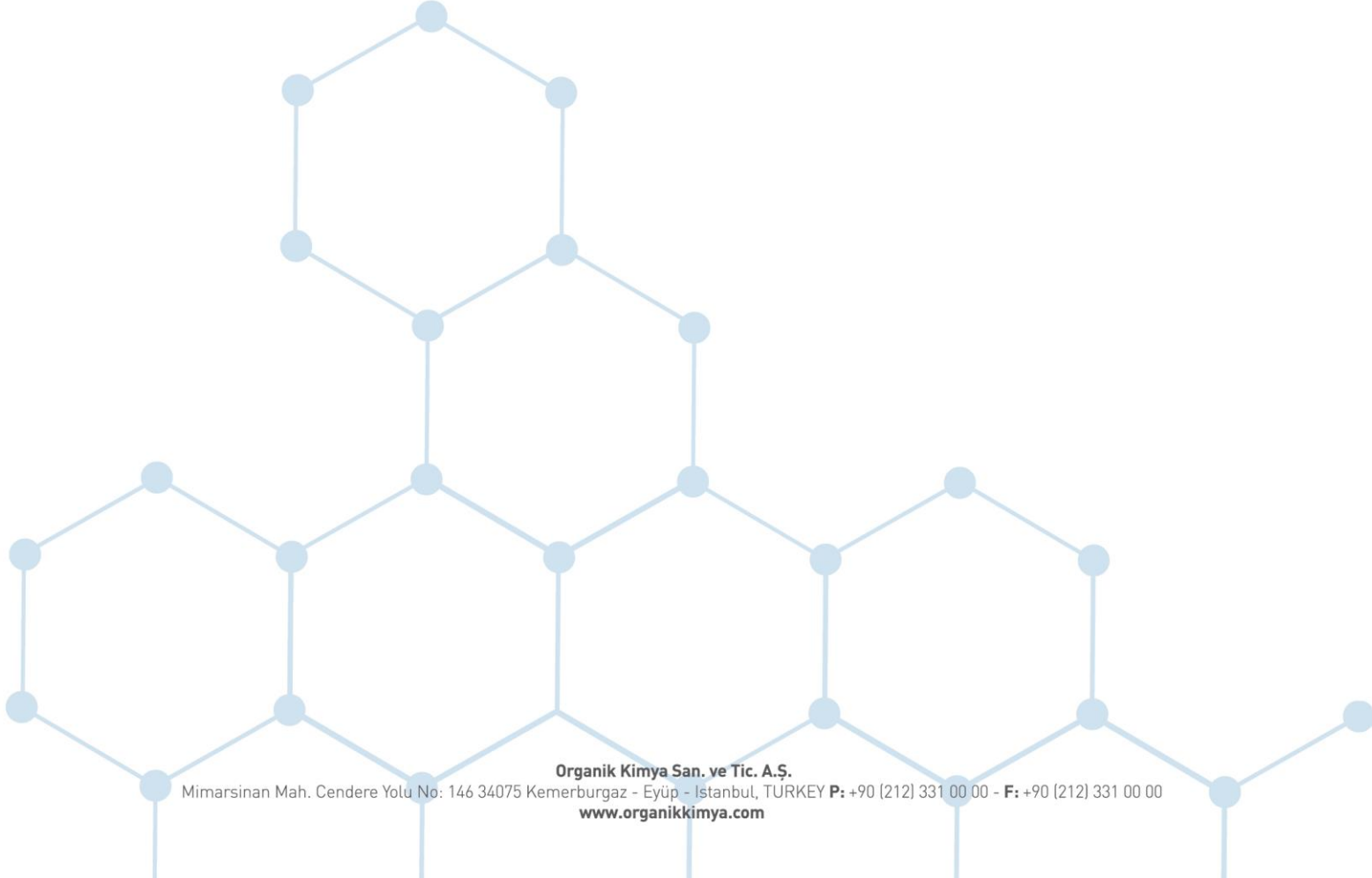
5) Information and Consultation

Contact Person to get more detailed information about the Organik Group Companies Law on the Protection of Personal Data and to consult about the compliance of the practices with the rules and standards;

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