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INTRODUCTION

1. Data Controller

Pursuant to Law No. 6698 on the Protection of Personal Data (the "Law"), your personal data may be processed by Benteler Gebze Taşıt San. ve Tic. Ltd. Şti. (the "**Company**") in its capacity as data controller. Our Company is domiciled at TOSB Otomotiv (OSB) Mah. 4. Cadde No:5/1 41420 Çayırova/Kocaeli, and you may also contact our Company via the registered electronic mail (KEP) address bentelergebze@hs01.kep.tr.

The protection of personal data is among the Company's foremost priorities. For this reason, **our Company** makes every effort to act in compliance with all legal regulations in force.

For this reason, our Company has prepared this Public Privacy Notice (the "Notice") in respect of the personal data we process. Within this Notice, you may obtain comprehensive information on the personal data processing activities carried out by our Company, see the principles and fundamental rules adopted during our data processing activities, and thereby transparently monitor the security of your personal data that is being or will be processed by our Company and the lawfulness of the activities carried out by our Company. Accordingly, in full awareness of our responsibility for the processing and protection of the data of data subjects, your personal data is processed and protected within the scope of this Notice.

In this Notice, the expressions "you" or "your" refer to the data subjects to whom this privacy notice is addressed.

In this Notice, the expressions "Company", "we", "us" or "our" refer to Benteler Gebze Taşıt San. ve Tic. Ltd. Şti.

2. Scope

This Notice relates to all personal data of our Company's employees, employee candidates, interns, employees' relatives, employees of subcontractors and contract manufacturers (toll manufacturers), natural-person suppliers, authorised representatives and employees of suppliers and customers, visitors, website visitors, shareholders or partners and other third parties that is processed wholly or partly by automated means, or by non-automated means provided that it forms part of a data filing system.

This document has been prepared to provide you with general information on our Company's data processing activities; separate privacy notices are also provided in the areas where your personal data is processed outside the scope of this document.

3. Application of the Legislation

With regard to the protection of personal data, Law No. 6698 and the secondary legislation shall at all times be applied with priority. By this Notice, our Company regulates the obligations imposed under the legislation by giving them concrete form within the scope of the Company's practices.

4. Definitions

For the purposes of this privacy notice;

Term	**Description**
Explicit Consent	means consent relating to a specific matter, based on information and given of free will. In this context, explicit consent means the declaration of intent addressed to our Company by the data subject, upon our Company's request or of his/her own accord, for the purpose of enabling the processing of his/her personal data,
Recipient Group	means the natural or legal persons to whom personal data is transferred by our Company,
Anonymisation	means the process of rendering personal data incapable of being associated with an identified or identifiable natural person, even by matching it with other data,

Employee	means a person who performs work under a contract at our Company and/or at one of its affiliated companies,
Employee Candidate	means a person who has applied for a job at our Company and/or at one of its affiliated companies,
Relevant User	means the persons or units acting within our Company's organisation or in line with the authority and instructions received from our Company, including the persons or units responsible for the storage, protection or backup of data,
Law	means Law No. 6698 on the Protection of Personal Data published in the Official Gazette dated 7 April 2016 and numbered 29677,
Recording Medium	means any medium in which personal data is held,
Personal Data	means any information relating to an identified or identifiable natural person,
Personal Data Inventory	means the inventory created by data controllers by associating the personal data processing activities they carry out depending on their business processes with the purposes of processing personal data, the data category, the recipient group to which data is transferred and the data subject group, and detailed by explaining the maximum period necessary for the purposes for which the personal data is processed, the personal data envisaged to be transferred to foreign countries and the measures taken concerning data security,
Data Subject	means the natural person whose personal data is processed,
Destruction of Personal Data	means the erasure, anonymisation or destruction of personal data,
Policy	means the Policy on the Processing and Destruction of Personal Data applied within the Company and put into force for the purpose of ensuring that personal data processing activities are carried out in compliance with the law,
Erasure of Personal Data	means the process of rendering personal data inaccessible and non-reusable for the relevant users,
Irreversible Destruction of Personal Data	means the process of rendering personal data inaccessible, irretrievable and non-reusable by anyone in any manner whatsoever,
Processing of Personal Data	means any operation performed on data, such as the obtaining, recording, storage, retention, alteration, reorganisation, disclosure, transfer, takeover, making available, classification of personal data or preventing its use, wholly or partly by automated means, or by non-automated means provided that it forms part of a data filing system,
Authority	means the Personal Data Protection Authority,
Board	means the Personal Data Protection Board,
Special Categories of Personal Data	means data relating to the race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures of individuals, as well as biometric and genetic data,
Periodic Destruction	means the erasure, destruction or anonymisation process to be carried out ex officio at recurring intervals specified in the personal data retention and destruction policy where all of the conditions for processing personal data set out in the Law cease to exist,
Registry	means the Data Controllers' Registry kept by the Presidency of the Personal Data Protection Authority,

Data Processor	means the natural or legal person who processes personal data on behalf of the data controller on the basis of the authority granted by the data controller,
Data Controller	means the natural or legal person who determines the purposes and means of processing personal data and who is responsible for the establishment and management of the data filing system,

PROCESSING AND PROTECTION OF PERSONAL DATA

5. Collection of Personal Data

Your personal data may be collected verbally, in writing or electronically, by automated or non-automated methods, through our Company's units, website, social media channels, cameras located in areas belonging to our Company, applications belonging to our Company and similar means, although this may vary depending on your relationship with our Company. Your personal data may be processed for as long as your relationship with our Company continues and for the period to be determined by law or in connection with the purpose.

The data subject groups whose personal data is processed by our Company, the categories of personal data processed, the purposes of processing and the recipient groups to whom personal data is transferred are explained below on the basis of our Company's personal data processing inventory. Detailed information regarding specific data processing activities is set out in the privacy notices separately provided to the relevant data subject groups.

5.1. Data you provide through direct interaction

In some of your direct interactions with our Company, you provide your personal data to our Company. Without being limited to the following, this may occur by filling in the forms on our Website; in communications you establish through our electronic portals or platforms, by e-mail or by post; in communications conducted face to face or by telephone; or while visiting our facilities.

Apart from these, we may also process your personal data in the following cases:

- **Where you apply to obtain information about our services;**
- **Where you supply goods or services to us or submit a quotation;**
- **Where you register/become a member of our website or applications;**
- **Where you make use of our free Wi-Fi service;**
- **By giving us your business card at an event or meeting or by leaving your contact details at the reception desk or switchboard of one of our facilities;**
- **Where you apply for a job;**
- **Where you enter into an employment contract with our Company and throughout the continuation of the employment relationship;**
- **Where you work at our Company's workplace as an employee of a subcontractor or contract manufacturer (toll manufacturer);**
- **Where you transfer your personal data to us through electronic portals and platforms that we share with you;**
- **Where you provide feedback to us;**

5.1.1. Website, electronic portals and platforms

Where you use our Website or the electronic portals or platforms that we have provided or offered within the scope of our services, you provide our Company with your data falling within the identity, contact and transaction security personal data groups. We also collect your personal data by using cookies, server logs or other similar technologies. For further details, please review our Cookie Policy.

5.1.2. Third-party sources

We may receive your Identity, Contact, Financial, Professional and Personnel File Data from third parties in the following cases.

Where you provide your personal data to a third party, such as recruitment agencies and consultants, for the purpose of sharing it with us;

Where the firms working with us as subcontractors or contract manufacturers (toll manufacturers) share with our Company the documents required under the occupational health and safety legislation (including identity, personnel file, training and health information) relating to their employees assigned to our Company's workplace;

Where information is obtained, within the scope of our legal obligations, from the joint health and safety unit (OSGB) and the occupational physician from whom we receive occupational health and safety services, and from public institutions and organisations such as the Social Security Institution (SGK).

5.1.3. Publicly available sources:

We may collect Identity, Contact, Professional and Personnel File Data from publicly available sources, including the following.

- Publicly available records of individuals,
- Publicly available records of companies, courts and other organisations,
- Publicly available records of public institutions or organisations,
- Other public or semi-public sources, including services accessible via the Internet such as LinkedIn.

5.1.4. Interactions such as automated technologies or cookies:

Technical data and User data containing identifiers or information about your behaviour may be collected through the mobile device or similar electronic devices you use. This data is collected by using cookies, server logs or other similar technologies on our website. For further details, please review our Cookie Policy.

6. Processing of Personal Data and Purposes of Processing

We collect, use, store and transfer different types of personal data about you. The categories of personal data processed by our Company, which may vary depending on business activities, are set out below;

a. "Identity Data": may include your name, surname, Turkish Republic identity number, mother's and father's names, place and date of birth, age, gender, marital status, civil registry information, driving licence information and tax number;
b. "Contact Data": may include your address, e-mail address and telephone number;
c. "Financial Data": may include your bank account number and IBAN details, as well as information on payments made to you;
d. "Transaction Security Data": includes information relating to your use of our Website, our electronic portals and platforms, as well as our local area network facilities (including Wi-Fi) and similar electronic services; information collected progressively when you visit our Website; the electronic portals and platforms, including your referring website; the pages you visit; technical information collected when you access our Website or the electronic portals and platforms that we offer or that we have agreed to use with you, including your Internet protocol (IP) address or the domain names of the devices used, your login data, browser type and version, uniform resource identifier (URI) address, time zone setting and location; browser plug-in types and versions, operating system and platform and other technologies on the devices you use; as well as user and login information relating to our Company's information systems (including enterprise resource planning, payroll and timekeeping software), Internet access logs kept under Law No. 5651, and corporate e-mail records;
e. "Professional Experience": including your job title, level of education, diploma and graduation information, the professional training and occupational health and safety training you have received, your certificates and documents (including work machinery operator certificate), your previous work experience and your CV information;
f. "Visual and Audio Recordings": we may store video in cases such as during your job application or where meetings held within the Company are recorded, or data relating to your photographs contained in your job application and personnel file;
g. "Personnel File": we may store data such as wage payments made to you, your declarations and notifications, disciplinary sanctions imposed on you, military service status, leave information, registration number, insured employment commencement notification and timekeeping records;
h. "Special Categories of Personal Data": Your special categories of personal data are processed only where required by legal regulations, and the special categories of personal data processed by our Company are Health Data and Criminal Convictions and Security Measures. In this context, pursuant to the occupational health and safety legislation, health data such as pre-employment and periodic medical examination and test results, health reports, blood type, medical history, occupational accident information and smoking/alcohol use, as well as criminal record information in cases stipulated by the legislation, may be processed. A "Policy on the

Management of Special Categories of Personal Data" has additionally been established and put into practice within our Company for the management of Special Categories of Personal Data. You may obtain the Policy upon request through our communication channels.

i. "Physical Premises Security": including CCTV footage and other information relating to access to our facilities obtained by electronic means, such as swipe card records or the visitor logbook.
j. *"Other Data": the name and surname information of the persons you are obliged to support (spouse and children), and body measurements and shoe size for the purpose of providing personal protective equipment and workwear.*

Our Company does not offer services directed at children and does not knowingly engage in the processing of personal data belonging to children. However, due to certain legal regulations or fringe benefits provided to our employees, it may be necessary to process personal data belonging to children. In such case, we process such personal data only where this is mandatory for the provision of the specific service we provide or for the fulfilment of a legal obligation.

Your personal data;

• Conducting Emergency Management Processes • Conducting Information Security Processes • Conducting Employee Candidate / Intern / Student Selection and Placement Processes • Conducting Employee Candidate Application Processes • Fulfilling Obligations Arising from Employment Contracts and Legislation for Employees • Conducting Fringe Benefits and Perquisites Processes for Employees • Conducting Employee Satisfaction and Engagement Processes • Carrying out Training Activities • Conducting Finance and Accounting Affairs • Conducting Company / Product / Service Loyalty Processes • Ensuring Physical Premises Security • Conducting Assignment Processes • Following up and Conducting Legal Affairs • Carrying out Internal Audit / Investigation / Intelligence Activities • Carrying out Communication Activities • Planning Human Resources Processes • Carrying out / Auditing Business Activities • Carrying out Occupational Health / Safety Activities • Receiving and Evaluating Suggestions for the Improvement of Business Processes	• Carrying out Logistics Activities • Conducting Goods / Services Procurement Processes • Conducting Goods / Services After-Sales Support Services • Conducting Goods / Services Sales Processes • Conducting Goods / Services Production and Operation Processes • Conducting Customer Relationship Management Processes • Carrying out Customer Satisfaction Activities • Organisation and Event Management • Conducting Marketing Analysis Activities • Conducting Advertising / Campaign / Promotion Processes • Conducting Risk Management Processes • Carrying out Storage and Archiving Activities • Conducting Contract Processes • Follow-up of Requests / Complaints • Conducting Supply Chain Management Processes • Implementing the Remuneration Policy • Conducting Marketing Processes for Products / Services • Carrying out Talent / Career Development Activities • Providing Information to Authorised Persons, Institutions and Organisations • Carrying out Business Continuity Activities

for the purposes set out above;

a. In compliance with the law and the principle of good faith;

Our Company processes personal data in accordance with the principles laid down by the legal regulations and with the general rules of trust and good faith. Our Company carries out periodic assessments to ensure compliance with the legal regulations and, where necessary, suspends the data processing activity or makes changes to its processes. Within this framework, our Company processes data having regard to its commercial purposes and business activities, to the extent required by, and limited to, them.

b. Accurate and, where necessary, kept up to date;

Our Company takes the necessary measures to ensure that the personal data it processes are up to date and accurate, and provides data subjects with mechanisms through which they can update any errors or omissions. If you believe that your personal data are inaccurate or out of date, you may notify our Company of the situation using the communication channels.

c. Relevant, limited and proportionate to the purposes for which they are processed;

Our Company collects personal data only of the nature and to the extent required by its business activities and processes them only to the extent necessary to fulfil the specified purposes.

d. Retained for the period stipulated in the relevant legislation or necessary for the purpose for which they are processed;

Where the data processing purposes do not require a longer retention period, our Company retains personal data for the minimum period stipulated in the legislation. Our Company first determines whether the legislation stipulates a maximum or minimum period for the retention of personal data. Where a statutory period exists, personal data are retained in compliance with the legal regulations. At the end of the specified retention periods, personal data are destroyed in accordance with the periodic destruction intervals or upon the data subject's application, using the specified destruction methods (erasure and/or destruction and/or anonymisation).

are processed.

7. Special Circumstances in which Personal Data are Processed

Personal Data We Process Relating to Visitors to Our Website

If you visit our Company's website, certain of your personal data may be collected by means of small data files called “cookies”, which are exchanged between the server and the user's device in order to identify users and improve the browsing experience. Cookies are used by our Company to ensure the security, quality and efficiency of the service provided through our website. Detailed information on the cookies used on our website can be found in our Cookie Policy.

Through the privacy settings and cookie settings on the website, you can see which data are collected and for what purpose, and you can block the use of cookies other than strictly necessary cookies.

7.1. Camera Monitoring Activities Carried Out at Building and Facility Entrances and Inside Buildings and Facilities

All immovable properties, including but not limited to the buildings, facilities and workplaces belonging to our Company, may be monitored and recorded by security cameras 24/7 in order to protect the legitimate interest of the Company, to ensure the safety of life and property of employees, visitors and other third parties, and to fulfil our legal obligations. Camera recordings are retained for 30 (thirty) days from the date of recording and are destroyed at the end of this period.

Monitoring and recording activities are carried out by our Company in compliance with the relevant legislation in order to ensure security in its buildings and facilities.

In accordance with Article 10 of the Law, our Company informs the relevant data subjects of the camera monitoring activity by more than one method. Information is provided by means of layered privacy notices in the areas monitored by cameras, and data subjects are made aware of the data processing activity through warning signs placed in those areas.

Through the monitoring and transfer policy in place at our Company, it has been determined in which cases and by whom camera recordings may be viewed, and to whom and by which procedures they may be transferred upon request, and employees have been informed in order to ensure compliance with the policies and procedures. Our Company declares that the recordings are accessible only to a limited number of persons, that such persons have been required to sign a confidentiality undertaking, and that the necessary technical and administrative measures have been taken to ensure the confidentiality of the data. Our Company declares that it will fulfil requests received from third parties concerning camera recordings, in a proportionate manner and in line with the request, where such requests come from public

institutions or organisations or from judicial or administrative authorities and the request has been delivered to our Company in compliance with the legal regulations.

Camera monitoring activities are carried out by our Company limited to the purposes listed in the privacy notices and in accordance with the principle of proportionality; accordingly, the number of security cameras, the times at which monitoring is carried out, the recording period and the areas recorded are arranged so as to be sufficient, in quantity and quality, to achieve these purposes.

The monitoring activity is not carried out in a manner that exceeds the purposes set out in the privacy notice or, in any event, in a manner that would constitute an interference with the private sphere of an individual's private life (for example, in toilets, inside company vehicles, or monitoring via company telephones), and the monitored areas are made known to data subjects.

7.2. Monitoring of Visitor Entries and Exits at Building or Facility Entrances and Inside Buildings or Facilities

At the entrances to all immovable properties, including but not limited to the buildings, facilities and workplaces belonging to our Company, visitors may be monitored in order to protect the legitimate interest of the Company and to ensure the safety of life and property of employees, visitors and other third parties.

In accordance with Article 10 of the Law, our Company informs data subjects who come to Company buildings as visitors by more than one method.

The data obtained by our Company for the purpose of monitoring the entries and exits of our visitors are processed solely for that purpose, and the relevant personal data are recorded in a data recording system in physical form.

Our Company fulfils requests received from third parties concerning visitor records, in a proportionate manner and in line with the request, where such requests come from public institutions or organisations or from judicial or administrative authorities and the request has been delivered to our Company in compliance with the legal regulations.

8. Protection of Personal Data

In accordance with Article 12 of the Law, our Company takes, in full and according to the nature of the personal data, the measures to protect personal data against unlawful disclosure, access and transfer and/or against breaches that may otherwise occur.

In addition to the legal regulations, our Company takes the necessary security measures in accordance with the guidelines published by the Personal Data Protection Board (the “Board”), takes technical and administrative measures having regard to industry standards and our Company's business processes and activities, and carries out or commissions internal and external audits.

In order to prevent the unlawful processing of and unlawful access to personal data and to ensure that personal data are retained in compliance with these legal regulations and internal procedures and policies, our Company organises employee training and, where applicable, prepares implementation principles in its departments and units.

For the purpose of protecting personal data and raising awareness in this area, our Company establishes the necessary systems in the workplace and, where needed, works with experts and consultants on the subject. Accordingly, our Company organises training sessions, seminars and information sessions and subsequently evaluates the stakeholders who participated in the training.

Training is updated and renewed in parallel with updates to the relevant legislation.

9. Protection of Special Categories of Personal Data

The legislation attributes special importance to certain personal data on the grounds that access to them by third parties may cause the data subject to be victimised or subjected to discrimination. These data are data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of an association, foundation or trade union, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data.

Our Company acts with due care in the collection, processing, transfer and protection of these personal data, which are regarded as “special categories”. In this context, the technical and administrative measures taken for the protection of personal data are also applied to special categories of personal data; in addition, however, separate security measures are taken specifically for “special categories” of personal data, having regard to the nature of the data.

9.1. Existence of the Data Subject's Explicit Consent;

Where the data subject's explicit consent exists, personal data may be processed within the scope of the explicit consent given in relation to a specific matter and on an informed basis.

Explicit consent is obtained from data subjects before the data processing activity, and data subjects are informed of which of their personal data are processed on the basis of the explicit consent processing condition.

Cases in which the Data Subject's Explicit Consent Is Not Required;

At our Company, personal data may also be processed in certain cases where the data subject's explicit consent does not exist. These cases are limited to the situations set out in the Law, and operationally our Company gives priority to relying on the processing conditions listed in the Law and explained below.

Where the conditions listed in the Law and explained below do not exist, the data processing activity is based on the explicit consent of the data subject. Otherwise, your personal data are processed pursuant to the following cases listed in Article 5(2) of the Law:

(a) Being Expressly Provided for by the Laws

Pursuant to the legal regulations, the processing of certain personal data is a legal obligation, and in such case our Company processes personal data without the need for the data subject's explicit consent. These cases may vary for each data processing activity, and changes in the processing conditions may also arise as a result of amendments to the laws. This data processing condition may be said to exist where processing is expressly provided for by law, in other words, where the relevant law contains an express provision on the processing of personal data.

(b) Inability to Obtain the Data Subject's Explicit Consent Due to Actual Impossibility

The personal data of the data subject may be processed where processing is necessary to protect the life or physical integrity of the person himself/herself or of another person, where that person is unable to express his/her consent due to actual impossibility or whose consent is not deemed legally valid.

(c) Being Directly Related to the Establishment or Performance of a Contract

This condition may be deemed to be fulfilled where the processing of personal data is necessary, provided that it is directly related to the establishment or performance of a contract to which the data subject is a party.

(d) Fulfilment of the Company's Legal Obligation

The personal data of the data subject may be processed where processing is mandatory for our Company to fulfil its legal obligations.

(e) The Data Subject Having Made His/Her Personal Data Public

Where the data subject has made his/her personal data public, the relevant personal data may be processed limited to the purpose of making them public.

(f) Data Processing Being Mandatory for the Establishment or Protection of a Right

The personal data of the data subject may be processed where data processing is mandatory for the establishment, exercise or protection of a right.

(g) Data Processing Being Mandatory for the Legitimate Interest of Our Company

The personal data of the data subject may be processed where data processing is mandatory for the legitimate interests of our Company, provided that this does not harm the fundamental

rights and freedoms of the data subject. Before commencing a data processing activity on the basis of legitimate interest, a "balancing assessment" is carried out and the legitimate interest of our Company is established.

10. Processing of Special Categories of Personal Data

Pursuant to Article 6(3) of the Law, your special categories of personal data may be processed only where one of the following cases exists:

a) The data subject has given explicit consent,
b) It is expressly provided for by the laws,
c) It is mandatory for the protection of the life or physical integrity of the person himself/herself or of another person, where that person is unable to express his/her consent due to actual impossibility or whose consent is not deemed legally valid,
ç) It relates to personal data made public by the data subject and is in line with the data subject's intention to make them public,
d) It is mandatory for the establishment, exercise or protection of a right,
e) It is necessary, by persons under an obligation of confidentiality or by authorised institutions and organisations, for the purposes of protecting public health, preventive medicine, medical diagnosis, the provision of treatment and care services, and the planning, management and financing of health services,
f) It is mandatory for the fulfilment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance,
g) It concerns current or former members and affiliates of foundations, associations and other non-profit organisations or bodies established for political, philosophical, religious or trade union purposes, or persons who are in regular contact with such organisations and bodies, provided that it is in compliance with the legislation to which they are subject and their purposes, limited to their fields of activity, and not disclosed to third parties.

Our Company processes your special categories of personal data predominantly on the legal bases of the fulfilment of legal obligations in the fields of employment, occupational health and safety and social security, and of being expressly provided for by the laws. Where none of the cases listed above exists, your special categories of personal data are processed solely on the basis of your explicit consent. In the processing of special categories of personal data, the adequate measures determined by the Board are also taken.

11. To Whom and for What Purpose the Processed Personal Data May Be Transferred

11.1. Purpose of the Transfer of Personal Data

Your collected personal data may be transferred to our business partners, our suppliers, and legally authorised public institutions and private persons, within the framework of the personal data processing conditions and purposes set out in Articles 8 and 9 of the PDPL, for the purposes of ensuring that the necessary work is carried out by the relevant business units so that you may benefit from our Company's services, ensuring the legal and commercial security of our Company and of persons in a business relationship with our Company, determining and implementing our Company's commercial and business strategies, and ensuring the implementation of our Company's human resources policies.

Where necessary, and subject to the applicable laws, our legal obligations and any business terms we may agree with you, we may disclose your personal data to the following:

- Official institutions and organisations, through authorised public institutions and organisations and the web portals, post or other communication channels belonging to such institutions, to the extent permitted and required by the provisions of the legislation, for the purpose of fulfilling our Company's obligations under the law,
- Authorised public institutions and organisations, in particular the Social Security Institution (SGK), the Ministry of Labour and Social Security, the Ministry of Health and tax offices, for the purpose of fulfilling obligations arising from the employment contract and from social security, tax and occupational health and safety legislation,
- The bank with which we work in this regard, so that your employee payments can be made,
- The firm from which services are obtained in this regard, so that the payroll process can be carried out,

- The joint health and safety unit (OSGB) firm from which services are obtained in this regard, so that occupational health and safety processes can be carried out in compliance with the legislation,
- The measurement and inspection firms from which services are obtained so that workplace environment measurements and inspections under the legislation can be carried out, and the service provider of the software in which occupational health and safety records are kept,
- The authorised bodies issuing certificates, so that professional qualification certificates such as work machine operator certificates can be obtained,
- The firm with which we work in the relevant matter for reasons such as transport, vehicle supply, meal cards, identity cards, printing of business cards and car park registration,
- The travel company, tour operators and hotels from which services are obtained in this regard, so that travel and accommodation can be supported and organised,
- The pension/insurance companies from which services are obtained in this regard, so that enrolments in private health insurance, personal accident insurance and compulsory private pension schemes can be made and the related payments can be effected,
- Our lawyers and judicial authorities, so that our legal rights can be exercised; the company providing e-invoice, e-archive and taxation services, the financial audit firm and the sworn financial advisory firm from which services are obtained, so that financial processes can be carried out,
- Technical support firms providing services for the installation, development and maintenance of the technical infrastructure/electronic systems, so that records can be transmitted securely and in compliance with the legislation.
- Since certain processes relating to our employees, suppliers and customers (including human resources, purchasing, information technology, back-up and reporting processes) are conducted through the shared systems and departments of the BENTELER Group companies, BENTELER Group companies established in Turkey and abroad, in particular in Germany and Spain, and their personnel authorised in this regard,
- Your personal data may be stored securely abroad, through the e-mail service within the Microsoft 365 system from which we obtain communication services, with the technical protection applications available in those services. Information in Turkish on the security of personal data is available at https://www.microsoft.com/tr-tr/trust-center, and English-language certificates and audit reports on compliance are available at https://servicetrust.microsoft.com.
- Any competent court or public institutions or organisations, tax offices or other regulatory authorities, law enforcement agencies or the public prosecutor's office or lawyers, and any person, institution or organisation that is likewise required by the legal regulations to respond to lawful requests for information;
- Our professional advisers or auditors, including lawyers, bankers, auditors, accountants and insurers providing consultancy, legal, banking, audit, accounting or insurance services to our Company;
- Financial institutions providing financing to our Company;
- Service providers providing information technology and system management services to our Company;

and we may share your personal data with the foregoing.

Transfer of Personal Data Abroad

With regard to the transfer of personal data abroad, taking into account the amendments made to Law No. 6698 on the Protection of Personal Data by Law No. 7499 Amending the Code of Criminal Procedure and Certain Laws, our Company may, in transferring personal data abroad, carry out transfers

(a) where an adequacy decision exists, on the basis of the adequacy decision;

(b) where there is no adequacy decision, by providing one of the appropriate safeguards listed in Article 9(4) of the Law (a standard contract announced by the Board, binding corporate rules approved by the Board, or a written undertaking with the permission of the Board), provided that the data subject also has the opportunity to exercise his/her rights and to seek effective legal remedies in the country to which the transfer is to be made;

(c) in incidental cases, within the scope of Article 9(6) of the Law.

In this context, your personal data may be transferred, limited to the purposes stated above and in accordance with Article 9 of the Law, to our group companies abroad, in particular the BENTELER Group companies established in Germany and Spain, and to information technology service providers whose servers are located abroad, such as Microsoft 365. In transfers to countries for which there is no adequacy decision, a standard contract is signed and the contract is notified to the Authority within five business days of the date of signature.

In this context, we require, as a fundamental condition of the transfer, that any data recipient to whom we transfer your personal data protects the confidentiality and security of your personal data and acts in compliance with the legislation.

RETENTION AND DESTRUCTION OF PERSONAL DATA

Our Company retains personal data for the period necessary having regard to the purpose for which they are processed and in accordance with the minimum or maximum periods stipulated in the legal regulations governing the relevant activity. In this context, our Company first determines whether the relevant legislation stipulates a period for the retention of personal data and, where a period has been set, acts in accordance with that period. Where no period is specified under the legal regulations, personal data are retained for the period necessary for the purpose for which they are processed. At the end of the specified retention periods, personal data are destroyed in accordance with the periodic destruction intervals or upon the data subject's application, using the specified destruction methods (erasure and/or destruction and/or anonymisation).

RIGHTS OF DATA SUBJECTS AND REQUESTS THAT MAY BE SUBMITTED TO OUR COMPANY

12. Rights of the Data Subject Listed in Article 11 of the PDPL

As data subjects, if you submit your requests concerning your personal data to our Company by the methods set out below, our Company will conclude your request free of charge as soon as possible and within 30 days at the latest, depending on the nature of the request.

However, if a fee is stipulated by the Personal Data Protection Board, the fee in the tariff determined by the Board may be charged. In this context, data subjects have the right to:

a. learn whether their personal data are processed,
b. request information if their personal data have been processed,
c. learn the purpose of the processing of their personal data and whether they are used in line with that purpose,
d. know the third parties to whom their personal data are transferred domestically or abroad,
e. request the rectification of their personal data if they are incompletely or inaccurately processed,
f. request the erasure or destruction of their personal data within the framework of the conditions set out in Article 7 of the PDPL,
g. request that the operations carried out regarding the rectification, erasure or destruction of personal data be notified to the third parties to whom the personal data have been transferred,
h. object to the occurrence of a result to their detriment by means of the analysis of the processed data exclusively through automated systems,
i. claim compensation for damage in the event that they suffer damage due to the unlawful processing of their personal data.

13. Exercise of Rights

Pursuant to Article 13(1) of the PDPL, you may submit your request relating to the exercise of your rights stated above to our Company in writing or by other methods determined by the Personal Data Protection Board. Pursuant to the Communiqué on the Procedures and Principles of Application to the Data Controller, you may submit your application in writing or via a registered electronic mail (KEP) address, secure electronic signature, mobile signature or the e-mail address previously notified by you to our Company and registered in our Company's system. Within this framework, the channels and procedures through which you may submit your applications to our Company under Article 11 of the PDPL are set out below.

In order to exercise your rights stated above, you may submit your request, containing the necessary information to establish your identity and your explanations regarding the right among those set out in Article 11 of the PDPL that you wish to exercise, by completing the application form available at www.benteler.com in a clear and comprehensible manner and attaching documents establishing your identity and address, with a wet signature, by hand, by registered mail with return receipt or through a notary public, to the address TOSB Otomotiv (OSB) Mah. 4. Cadde No:5/1 41420 Çayırova/Kocaeli, or, signed with a secure electronic signature or mobile signature, to the registered electronic mail (KEP) address bentelergebze@hs01.kep.tr.

Our Company reserves the right to make changes to this Notice in parallel with changes that may occur in the legal regulations and in its data processing activities. The current version of the Notice is available on our website.

Yours faithfully,