

**THE POLICY ON THE
PROTECTION AND
PROCESSING OF PERSONAL
DATA**

Document No	GEN.DOK.006
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1. PURPOSE .

Personal data protection strives to comply with all applicable legislation in this regard. Sistem Alüminyum San.ve Tic.A.Ş, and the protection of personal data processing policy (policy) personal data processing activities performed by our company within the framework of the adopted policies and in the conduct of the company's data processing activities of personal data protection adopted in compliance with the regulations of the Law No. 6698 describes the basic principles of respect, and thus our company provides the necessary transparency in informing the owners of personal data. Fully aware of our responsibility to this extent, your personal data is processed and protected under this policy.

2. SCOPE

This policy covers all personal data subject to our company's data processing activities under the law.

Details of the personal data processing activities carried out by our company for Sistem Alüminyum San. ve Tic. A.Ş. employee candidates or Sistem aluminum employees can be accessed from the Sistem Alüminyum San. ve Tic. A.Ş. employee candidates Personal Data Protection and processing policy on <http://www.sistemal.com/>.

3. RESPONSIBILITY

Sistem Alüminyum San. ve Tic. A.Ş.'s Liaison Officer prepares and approves this policy.

4. DEFINITIONS

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5. EXECUTION

Our company stores all personal data subject to data processing activities under the law in the following environments where personal data is processed by non-automatic means, provided that it is fully or partially automated or part of any data recording system:

Our company databases, third-party databases, email accounts, desktops and tablet computers, company employees ' tools (such as mobile phone, tablets), backup areas, paper files, etc.)

5.1 Implementation of Policy and Related Legislation

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The relevant legal regulations in force on the processing and protection of personal data will first find an application area. If there is a discrepancy between the current legislation and the policy, our company agrees that the current legislation will find an application area. The policy regulates the rules laid down by the relevant legislation by embodying them within the scope of company practices.

5.2 Policy's Enforcement

The effective date of this policy is 03.01.2020.

This policy is published on Sistem Alüminyum San. ve Tic. A.Ş.'s website (<http://www.sistemal.com/>) and made available to interested parties at the request of the personal data owners.

5.3 PERSONAL DATA PROTECTION CONSIDERATIONS

5.3.1 Ensuring the Security of Personal Data

Our company in accordance with Article 12 of the law of personal data unlawful disclosure, access, transfer, or security shortcomings that can occur in other ways to avoid taking the necessary measures according to the nature of the data to be protected. In this context, our company takes administrative measures to ensure the necessary level of security in accordance with the guidelines published by the Personal Data Protection Board ("Board"), conducts audits or conducts them.

5.3.2 Protection of Personal Data of Special Nature

Special importance has been attributed to the law because of the risk of victimization or discrimination of persons when a number of personal data is illegally processed. These data on race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, costume and dress, Association or trade union membership, health, sexual life, criminal convictions and security measures with biometric data and genetic data.

Sistem Alüminyum San. ve Tic. A.Ş.is treated with sensitivity in the protection of personal data of special quality, which is determined by law as "special quality" and processed in accordance with the law. In this context, the technical and administrative measures taken by Sistem Alüminyum San. ve Tic. A.Ş. for the protection of personal data are carefully implemented in terms of special quality personal data and the necessary audits are provided within Sistem Alüminyum San. ve Tic. A.Ş.

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Detailed information about the processing of special-quality personal data is provided in Section 5.4.3 of this policy ("Processing of Special-Quality Personal Data").

5.3.3 Increase and Control of Business Units' Awareness of the Protection and Processing of Personal Data

Sistem Alüminyum San. ve Tic. A.Ş. provides necessary training to business units to increase awareness of illegal processing of personal data, preventing illegal access to personal data and ensuring the preservation of personal data.

Sistem Alüminyum San. ve Tic. A.Ş. employees' personal data protection in order to create awareness of the necessary systems are established, in case of need on this issue works with consultants. Accordingly, our company evaluates the participation in the relevant trainings, seminars and information sessions and updates and renews its trainings in parallel with the update of the relevant legislation.

5.4 – CONSIDERATIONS FOR PROCESSING PERSONAL DATA

5.4.1 Processing of Personal Data in Accordance with the Principles Stipulated in the Legislation

5.4.1.1 Processing in Accordance with the Law and the Rule of Honesty

Sistem Alüminyum San. ve Tic. A.Ş. acts in accordance with the principles introduced by legal regulations and the general rule of trust and honesty in the processing of personal data. In this context, personal data is processed to the extent and limited to the extent required by our company's business activities.

5.4.1.2 Ensuring That Personal Data is Accurate and Up-To-Date When Necessary

Sistem Alüminyum San. ve Tic. A.Ş. takes the necessary measures to ensure that personal data is accurate and up-to-date during the period of processing and establishes the necessary mechanisms to ensure the accuracy and timeliness of personal data for certain periods of time.

5.4.1.3 Processing for Specific, Explicit and Legitimate Purposes

Sistem Alüminyum San. ve Tic. A.Ş. clearly sets out the purposes for processing personal data and again processes it within the scope of the purposes related to these activities in line with business activities.

5.4.1.4 Be Limited and Restrained in Connection with the Purpose for Which They are Processed

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Sistem Alüminyum San. ve Tic. A.Ş. collects personal data only to the extent and nature required by business activities and processes it limited for specified purposes.

5.4.1.5 Retention for the Period Stipulated in the Relevant Legislation or Required for the Purpose for Which They are Processed

Sistem Alüminyum San. ve Tic. A.Ş. retains personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the legislation to which the relevant activity is subject. In this context, our company first determines whether a period is stipulated for the storage of personal data in the relevant legislation and acts in accordance with this period if a period is determined. If a legal period is not available, personal data is stored for the period required for the purpose for which they are processed. Personal data is destroyed at the end of the specified retention periods in accordance with the periodic destruction periods or the data owner's application and by the specified destruction methods (deletion and/or destruction and/or anonymization).

5.4.2 Terms of Processing of Personal Data

Except for the express consent of the personal data owner, the basis of the personal data processing activity may be only one of the following conditions, and more than one condition may be the basis of the same personal data processing activity. If the processed data is personal data of a special nature, the conditions contained in **5.4.3** title of this policy (*"Processing of Personal Data of a Special Nature"*) will apply.

• **Explicit Consent of the Personal Data Owner**

One of the conditions for processing personal data is the explicit consent of the data owner. The explicit consent of the owner of personal data must be disclosed on a specific issue, based on information and of free will.

Personal data may be processed without the explicit consent of the data owner in case of the existence of the following personal data processing conditions.

• **Explicitly Prescribing in Laws**

If the personal data of the data owner is clearly provided for in the law, in other words, the existence of this data processing requirement may be mentioned if there is a clear provision in the relevant law regarding the processing of personal data.

• **Inability to Obtain Explicit Consent of the Person Concerned Due to Actual Impossibility**

If the processing of personal data of a person who cannot disclose his consent due to actual impossibility or whose consent cannot be granted validity is mandatory to protect the life or body integrity of himself or another person, the personal data of the data owner may be processed.

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- **Direct Interest in the Establishment or Execution of the Contract**

Provided that it is directly related to the establishment or execution of a contract to which the data subject is a party, this condition may be considered fulfilled if the processing of personal data is necessary.

- **Fulfilling the Company's Legal Obligation**

If processing is mandatory for our company to fulfill its legal obligations, the personal data of the data owner may be processed.

- **Disclosure of Personal Data of the Personal Data Owner**

If the data owner has publicly disclosed his personal data, the relevant personal data may be processed for limited purposes.

- **Data Processing is Mandatory for the Establishment or Protection of a Right**

If data processing is mandatory for the establishment, use or protection of a right, the personal data of the data owner may be processed.

- **Data Processing is Mandatory for the Legitimate Interest of our Company**

Personal data of the data owner may be processed if data processing is mandatory for the legitimate interests of our company, provided that it does not damage the fundamental rights and freedoms of the personal data owner.

5.4.3 Processing of Specially Qualified Personal Data

Special personal data are qualified by our company, in accordance with the principles in this policy and by taking all necessary administrative and technical measures, including methods to be determined by the board and are processed in the presence of the following terms:

- **Special qualified personal data other than health and sexual life**, if there is a clear provision for the processing of personal data in the law to which the activity related to another expression is subject, it may be processed without the explicit consent of the data owner. Otherwise, the explicit consent of the data owner will be obtained for the processing of such special qualified personal data.
- **Special qualified personal data other than health and sexual life**, Public Health Protection, preventive medicine, medical diagnosis, treatment and care in the execution of services, for the purposes of financing the planning and management of Health Services, under the obligation of confidentiality by authorized persons or institutions without requiring explicit consent can be processed. Otherwise, the explicit consent of the data owner will be obtained for the processing of such special qualified personal data.

5.4.4 Disclosure of Personal Data Owner

Sistem Alüminyum San. ve Tic. A.Ş., in accordance with Article 10 of the law and secondary legislation, illuminates the owners of personal data. In this context, Sistem Alüminyum San. ve Tic. A.Ş.informs the relevant

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persons about who is responsible for personal data, for what purposes it is processed, for what purposes it is shared with whom, by what methods it is collected and the legal reason and the rights of the data owners within the scope of the processing of their personal data.

5.4.5 Transfer of Personal Data

Our company is in compliance with the law processing personal data for the purposes of taking the necessary safety precautions the holder of personal data and private personal data of personal data by qualified third parties (third party companies, public and private authorities, third real persons) transfer. In this direction, our company acts in accordance with the regulations provided for in Article 8 of the law. Detailed information on this issue can be accessed from Annex 4 ("*Annex 4 - third parties to which personal data is transferred by our company and the purposes of transfer*") of this policy.

5.4.5.1 Transfer of Personal Data

If one or more of the following conditions exist, even without the express consent of the personal data owner, personal data may be transferred to third parties by taking the necessary care by our company and taking all necessary security measures, including the methods prescribed by the board.

- Clearly foresee the relevant activities related to the transfer of personal data in the law,
- The transfer of personal data by the company is directly related and necessary to the establishment or execution of a contract,
- The transfer of personal data is mandatory for our company to fulfill its legal obligation,
- Transfer of personal data by our company in a limited manner for the purpose of disclosure, provided that the data subject has been publicly disclosed,
- The transfer of personal data by the company is mandatory for the establishment, use or protection of the rights of the company or the data owner or third parties,
- Personal data transfer activities are mandatory for the legitimate interests of the company, provided that they do not harm the fundamental rights and freedoms of the data owner,
- A person who cannot disclose his consent due to actual impossibility, or whose consent is not granted legal validity, is required to protect the life or body integrity of himself or someone else.

In addition to the above, personal data may be transferred to foreign countries declared by the board to have adequate protection ("**Foreign Country with Adequate Protection**") in the presence of any of the above conditions. In the absence of adequate protection, it may be transferred to foreign countries ("**Foreign Country Where There is a Data Controller Committed to Adequate Protection**") where the data controllers in Turkey and the relevant foreign country undertake adequate protection in writing and have the permission of the board in accordance with the data transfer conditions stipulated in the legislation.

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Transfer of Special Quality Personal Data

Special quality personal data can be transferred by our Company in accordance with the principles specified in this policy and by taking all necessary administrative and technical measures, including the methods to be determined by the Board, and in the presence of the following conditions:

- Personal data of special nature other than health and sexual life may be processed without the explicit consent of the data owner, in other words, if there is an explicit provision regarding the processing of personal data in the relevant law. Otherwise, the explicit consent of the data owner will be obtained.
- Explicit consent by persons or authorized institutions and organizations under the obligation of confidentiality for the purpose of special quality personal data regarding health and sexual life, protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing can be processed without searching. Otherwise, the explicit consent of the data owner will be obtained.

In addition to the above, personal data may be transferred to Foreign Countries with Sufficient Protection in the presence of any of the above conditions. In the absence of adequate protection, it may be transferred to Foreign Countries where the Data Controller Committing Sufficient Protection is located in line with the data transfer conditions stipulated in the legislation.

5.5 CATEGORIZATION AND PROCESSING PURPOSES OF PERSONAL DATA PROCESSED BY OUR COMPANY

In line with the personal data processing purposes of our Company, based on at least one of the personal data processing conditions specified in Articles 5 and 6 of the Law, and in a limited manner, the processing of personal data in particular, Personal data are processed in accordance with the general principles specified in the Law, including the principles specified in Article 4 of the Law. Within the framework of the purposes and conditions specified in this policy, detailed information about the categories of personal data processed and the categories can be found in Annex 3 ("ANNEX 3 - Personal Data Categories") document of the policy. Detailed information on the purposes of processing the personal data in question is included in Annex 1 of the policy ("ANNEX 1- Personal Data Processing Purposes").

5.6 STORAGE AND DISPOSAL OF PERSONAL DATA

Our company preserves personal data in accordance with the time required for the purpose for which they are processed and the minimum periods stipulated in the legal legislation to which the relevant activity is subject. In this context, our company first determines whether a period is stipulated for the storage of personal data in the relevant legislation, and if a period is specified, it acts in accordance with this period. If there is no legal period, personal data are stored for the time required for the purpose for which they are processed. Personal data are destroyed at the end of the specified storage periods, in accordance with the periodic destruction periods or the data owner application and with the determined destruction methods (deletion and / or destruction and / or anonymization).

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5.7 RIGHTS OF PERSONAL DATA OWNERS AND THE USE OF THESE RIGHTS

5.7.1 Rights of Personal Data Owner

Personal data owners have the following rights:

- (1) Learning whether personal data is being processed,
- (2) Requesting information if personal data has been processed,
- (3) Learning the purpose of processing personal data and whether they are used appropriately for their purpose,
- (4) To know the third parties to whom personal data are transferred domestically or abroad,
- (5) To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data are transferred,
- (6) Although it has been processed in accordance with the provisions of the Law and other relevant laws, to request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear, and to request notification of the transaction made within this scope to third parties to whom personal data have been transferred,
- (7) To object to the emergence of a result against the person himself by analyzing the processed data exclusively through automated systems,
- (8) To demand the compensation of the damage in case of damage due to the processing of personal data illegally.

5.7.2 Personal Data Owner Exercising His/Her Rights

Personal data owners will be able to submit their requests regarding their rights enumerated in section 5.7 ("Rights of Personal Data Owner") to our Company by the methods determined by the Board. In this direction, they will be able to benefit from "GEN.FR.001 Sistem Alüminyum San. ve Tic. A.Ş. Data Owner Application Form".

5.7.3 Our Company's Response to Applications

Our company takes the necessary administrative and technical measures to finalize the applications made by the personal data owner in accordance with the Law and secondary legislation. In case the personal data owner submits his request regarding the rights stated in section 5.7.1 ("Rights of the Personal Data Owner") to our Company in accordance with the procedure, our company will finalize the request free of charge as soon as possible and within 30 (thirty) days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board.

5.8 SPECIAL CASES WHERE PERSONAL DATA IS PROCESSED

5.8.1 Building, Facility Entrances and Personal Data Processing Activities within the Building and Facility, and Website Visitors

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In order to ensure security by Sistem Alüminyum San. ve Tic. A.S., personal data processing activities are carried out to monitor guest entrances and exits with security cameras in its buildings and facilities.

5.8.2 Sistem Alüminyum San. ve Tic. A.S. Camera Monitoring Activities Conducted at Building, Facility Entrances and Inside

Sistem Alüminyum San. ve Tic. A.S. carries out camera surveillance activities in accordance with the Law on Private Security Services and the relevant legislation in order to ensure security in its buildings and facilities. Sistem Alüminyum San. ve Tic. A.Ş., in order to ensure security in its buildings and facilities, performs security camera monitoring activities for the purposes stipulated in the relevant legislation in force and in accordance with the personal data processing conditions enumerated in the Law. Sistem Alüminyum San. ve Tic. A.S. In accordance with Article 10 of the Law, the personal data owner is enlightened by more than one method regarding the camera surveillance activity. In addition, Sistem Alüminyum San. ve Tic. A.Ş. processes personal data in a limited and measured manner in connection with the purpose for which they are processed, in accordance with Article 4 of the Law. Sistem Alüminyum San. ve Tic. A.S. The purpose of continuing the video camera surveillance activity is limited to the purposes listed in this policy. In this direction, the monitoring areas of security cameras, their number and when to be monitored are put into practice as sufficient and limited for this purpose. It is not subject to monitoring the privacy of the person in areas (for example, toilets) that may result in intervention that exceeds security objectives. Only limited numbers of Sistem Alüminyum San. ve Tic. A.S. employee has access. A limited number of people who have access to the records declare that they will protect the confidentiality of the data they access with a confidentiality commitment.

5.8.3 Sistem Alüminyum San. ve Tic. A.S. Tracking of Guest Entry and Exits at Building, Facility Entrances and Inside

Sistem Alüminyum San. ve Tic. A.S. to ensure security and for the purposes specified in this Policy, Sistem Alüminyum San. ve Tic. A.S. Personal data processing is carried out to monitor the entrance and exit of guests in its buildings and facilities. As a guest, Sistem Alüminyum San. ve Tic. A.S. While obtaining the names and surnames of the persons who come to Sistem Alüminyum San. ve Tic. A.S. In this context, personal data owners are enlightened by means of texts posted in the presence of the guests or made available to guests in other ways. The data obtained for the purpose of tracking guest entry and exit are processed only for this purpose and the relevant personal data are recorded in the data recording system in a physical environment.

5.9 DISCLOSURE TEXT

The disclosure text is detailed in the forms defined below.

GEN.DOK.001 DISCLOSURE TEXT FOR SHAREHOLDERS AND PARTNERS

GEN.DOK.002 SİSTEM ALUMİNYUM ANONİM SİRKETİ EMPLOYEE-EMPLOYEE CANDIDATE-INTERNSHIP

GEN.DOK.003 DISCLOSURE TEXT FOR SUPPLIER AND CUSTOMER

GEN.DOK.004 DISCLOSURE TEXT FOR VISITORS

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The disclosure text for visitors is published on the website.

5.10 EXPRESS CONSENT TEXT

Explicit consent text is defined in the forms below.

GEN.DOK.005 EXPRESS CONSENT TEXT

ANNEX 1 – Personal Data Processing Purposes

- Execution of Emergency Management Processes
- Execution of Information Security Processes
- Conducting Employee Candidate / Intern / Student Selection and Placement Processes
- Execution of Employee Candidates' Application Processes
- Fulfilling Obligations Arising From Employment Contract And Legislation For Employees
- Execution of Benefits and Benefits Processes for Employees
- Conducting Audit / Ethical Activities
- Conducting Training Activities
- Execution of Access Authorities
- Conducting Activities in Compliance with Legislation
- Execution of Finance and Accounting Affairs
- Execution of Loyalty Processes to Company / Products / Services
- Ensuring Physical Space Security
- Execution of Recruitment Processes
- Following and Execution of Legal Affairs
- Conducting Internal Audit / Investigation / Intelligence Activities
- Conducting Communication Activities
- Planning of Human Resources Processes
- Execution / Supervision of Business Activities
- Conducting Occupational Health / Safety Activities
- Receiving and Evaluating Suggestions for the Improvement of Business Processes
- Conducting Business Continuity Activities
- Execution of Logistics Activities
- Execution of Goods / Service Purchase Processes
- Execution of Goods / Service After Sales Support Services
- Execution of Goods / Service Sales Processes
- Execution of Customer Relationship Management Processes
- Conducting Activities for Customer Satisfaction
- Organization and Event Management
- Execution of Contract Processes
- Execution of Supply Chain Management Processes
- Conducting Talent / Career Development Activities

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- Informing Authorized Persons, Institutions and Organizations
- Carrying Out Management Activities
- Creating and Tracking Visitor Records
- Execution of Access Authorities

ANNEX 2 – Personal Data Owners

- Employee Candidate
- Employee
- Shareholder / Partner
- Potential Product or Service Buyer
- Intern
- Supplier Employee
- Supplier Executive
- Product or Service Receiver
- Visitor

ANNEX 3 – Personal Data Categories

- Identity
- Contact
- Location
- Personality
- Legal action
- Physical Space Security
- Process Security
- Professional experience
- Health Information
- Criminal Convictions and Security Measures
- Biometric Data
- Reference Information
- Vehicle Information
- Insurance Information

ANNEX 4 – Third Parties to whom Personal Data is Transferred by Our Company

- Shareholders
- Suppliers
- Authorized Public Institutions and Organizations
- Customer

4. REVISION HISTORY

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