

**UMS Uđur Metal Sanayi A.Ŗ.**  
**DATA PROTECTION AND PROCESSING POLICY**

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## **1) INTRODUCTION**

The protection of personal data is among the top priorities of UMS Uğur Metal Sanayi A.Ş. ('the Company'), and the Company makes maximum efforts to comply with all applicable regulations in this regard. In this context, the Personal Data Protection and Processing Policy ('the Policy') of UMS Uğur Metal Sanayi A.Ş. has come into effect by the decision of the relevant boards.

This Policy explains the general principles adopted in the processing of personal data by our Company and the fundamental principles adopted for the compliance of our Company's data processing activities with the regulations in the Law No. 6698 on the Protection of Personal Data, thus providing the necessary transparency by informing the relevant individuals and the public.

## **2) SCOPE**

This Policy relates to all personal data of any related individuals with whom the Company engages in any way, whether processed through automated means or non-automated means as part of any data recording system. The document containing the categorization of data, including the related individuals and the personal data processed for these individuals, is attached as 'Annex 1 - Personal Data Categories.'

In the event of any inconsistency between the current legislation and the Policy, the Company acknowledges that the applicable legislation will prevail. The Policy has been created by concretizing the rules set forth by the relevant legislation and Board decisions within the scope of Company practices.

## **3) PROCESSING OF PERSONAL DATA**

### **3.1. Basic Principles of Processing Personal Data**

#### **3.1.1. Processing in Compliance with the Law and Fairness Principle**

Personal data is processed in compliance with the general trust and fairness principle, ensuring that it does not harm individuals' fundamental rights and freedoms. In this context, personal data is processed by our company to the extent required by our business activities and limited to them.

#### **3.1.2. Ensuring the Accuracy and Timeliness of Personal Data**

Our company takes necessary measures to ensure the accuracy and timeliness of personal data throughout the processing period and establishes mechanisms to maintain the accuracy and timeliness of personal data at specific intervals.

### **3.1.3. Processing for Specific, Clear, and Legitimate Purposes**

Our company clearly defines the purposes of processing personal data and processes them within the scope of these purposes and activities related to these purposes.

### **3.1.4. Being Connected, Limited, and Proportional to the Purposes for Which They Are Processed**

Our company collects personal data only to the extent necessary for its business activities and processes them in a limited manner for the specified purposes.

### **3.1.5. Retaining Them for the Period Stipulated in the Relevant Legislation or Required for the Purpose for Which They Are Processed**

Our company retains personal data for the period necessary for the purpose of processing and the minimum period specified in the relevant legislation. If there is no specified legal period, personal data is retained for the duration necessary for the purpose of processing. At the end of the designated retention periods, personal data is destroyed through periodic disposal or in accordance with data owner requests, using specified destruction methods (deletion and/or destruction and/or anonymization).

## **3.2. Conditions for Processing Personal Data**

The explicit consent of the relevant individuals is one of the legal bases that enables the lawful processing of personal data, and personal data can be processed by our company without the explicit consent of the data owner in the presence of any of the conditions listed below.

In addition to explicit consent, the processing of personal data may be based on one or more of the conditions listed below. In the case of processing data that is of a special nature, the conditions outlined in the "Processing of Special Categories of Personal Data" section of this Policy will apply.

### **3.2.1. Being Clearly Foreseen in the Laws**

If explicitly foreseen in the law, in other words, if there is a clear provision in the relevant law regarding the processing of personal data, the personal data of the data subject may be processed by our company within the framework envisaged by the legislation.

### **3.2.2. Inability to Obtain Explicit Consent Due to Impossibility**

If it is necessary to process personal data to protect the life or bodily integrity of the data subject or another person due to the impossibility of obtaining consent in practice, the personal data of the data subject may be processed.

### **3.2.3. Directly Related to the Establishment or Performance of a Contract**

If the processing of personal data is necessary for the establishment or performance of a contract to which the data subject is a party or directly related to it, it may be considered that this condition has been fulfilled.

### **3.2.4. Fulfillment of Legal Obligations of the Company**

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

### **3.2.5. Public Disclosure of Personal Data by the Data Subject**

If the data subject has made their personal data public, the relevant personal data may be processed to the extent necessary for the purpose of public disclosure.

### **3.2.6. Necessity of Data Processing for the Establishment, Exercise, or Protection of a Right**

If the processing of personal data is necessary for the establishment, exercise, or protection of a right, the personal data of the data subject may be processed.

### **3.2.7. Necessity of Data Processing for the Legitimate Interests of the Company**

If the processing of personal data is necessary for the legitimate interests of our company, provided that it does not harm the fundamental rights and freedoms of the personal data subject, the personal data of the data subject may be processed.

## **3.3. Processing of Special Categories of Personal Data**

Personal data that falls under the category of sensitive information within the scope of the law (sensitive data) has been given special importance due to the risk of causing harm or discrimination to individuals when processed unlawfully. These "special category" personal data include race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance, and dress, membership of association, foundation or union, health, sexual life, criminal conviction, and data related to security measures, as well as biometric and genetic data.

Special category personal data is processed by our company in accordance with the principles outlined in this Policy and taking all necessary administrative and technical measures, including methods determined by the Personal Data Protection Board ("Board"), and under the following conditions:

Except for health and sexual life-related special category personal data, if there is a clear provision in the laws, meaning if there is a clear provision in the relevant law regarding the processing of personal data, these special category personal data may be processed without the explicit consent of the data subject. Otherwise, explicit consent of the data subject will be obtained.

Special category personal data related to health and sexual life may be processed without the explicit consent of the data subject by individuals or authorized institutions and organizations under the obligation of confidentiality for the purposes of protecting public health, conducting preventive medicine, carrying out medical diagnosis, treatment, and care services, and planning and managing the financing of health services. Otherwise, explicit consent of the data subject will be obtained.

### **3.4. Processed Personal Data Categories and Purposes of Processing**

The personal data categories processed by our company in accordance with the Law and other relevant legislation, as well as detailed information about these categories, can be accessed in the document "ANNEX 1 - Personal Data Categories" of this Policy.

In accordance with the conditions for processing personal data and special category personal data detailed in this Policy, the purposes of our company's personal data processing are as follows:

- Conducting emergency management processes of our company,
- Carrying out information security processes of our company,
- Carrying out candidate/intern selection and placement processes for our company,
- Fulfilling contractual and legal obligations for our company employees,
- Planning and/or executing human resources policies and processes of our company,
- Ensuring the physical security of our company's premises,
- Conducting sales processes related to products and services offered by our company,

- Planning and executing processes for managing relationships with our company's customers,
- Carrying out necessary work by relevant departments of our company for the realization of commercial and/or operational activities conducted by our company,
- Executing contract processes with parties our company enters into contracts with.

Moreover, the purposes of processing personal data by our company are not exhaustively listed in this document, and our company may process personal data obtained legally within the framework of other legal purposes of personal data processing as long as it fulfills its obligation to inform.

#### **4) TRANSFER OF PERSONAL DATA**

Our company, within the lawful purposes of processing personal data, may transfer the personal data and special category personal data of the relevant individual to third parties by taking necessary security measures. In this regard, our company acts in compliance with the regulations specified in Articles 8 and 9 of the Law.

##### **4.1. Transfer of Personal Data**

Even without the explicit consent of the personal data owner, our company, under the conditions listed below, may transfer personal data to third parties with necessary care, and taking all required security measures, including methods prescribed by the Board.

- Explicit provision in the laws regarding the transfer of personal data,
- Directly and necessarily related to the establishment or performance of a contract for the transfer of personal data by the Company,
- Mandatory for our company to fulfill its legal obligations for the transfer of personal data,
- Limited transfer of personal data by our company, provided that the data subject has made their personal data public for the purpose of public disclosure,
- Necessity for the transfer of personal data by our company for the establishment, exercise, or protection of the rights of our company, the data subject, or third parties,
- Necessity for the processing of personal data for the legitimate interests of our company, provided it does not harm the fundamental rights and freedoms of the personal data subject,
- Necessity for the protection of life or bodily integrity of an individual who is unable to express their consent due to practical impossibility or whose consent is legally invalid.

Personal data lawfully obtained by our company may be transferred to individuals, private legal entities, company suppliers, customers, and authorized public institutions and organizations within the country.

Personal data lawfully obtained by our company will not be transferred abroad.

## **4.2. Transfer of Special Category Personal Data**

Special category personal data may be transferred by our company, in compliance with the principles outlined in this Policy and taking all necessary administrative and technical measures, including methods determined by the Board, and under the conditions outlined below:

Except for health and sexual life-related special category personal data, if there is a clear provision in the laws, meaning if there is a clear provision in the relevant law regarding the transfer of personal data, these special category personal data may be transferred without the explicit consent of the data subject. Otherwise, explicit consent of the data subject will be obtained.

Special category personal data related to health and sexual life may be transferred without the explicit consent of the data subject by individuals or authorized institutions and organizations under the obligation of confidentiality for the purposes of protecting public health, conducting preventive medicine, carrying out medical diagnosis, treatment, and care services, and planning and managing the financing of health services. Otherwise, explicit consent of the data subject will be obtained.

Special category personal data lawfully obtained by our company will not be transferred abroad.

## **5) INFORMATION OF DATA SUBJECTS**

Our company, in accordance with Article 10 of the Law and secondary legislation, informs data subjects about the processing of their personal data. The information includes details on who processes their personal data as the data controller, the purposes of processing, with whom the data is shared, the methods of collection, the legal basis, and the rights of data subjects in the processing of their personal data. In this context, information obligation texts have been prepared and made accessible to the public at the company headquarters, branches, and on the company's website.

## **6) STORAGE AND ERASURE OF PERSONAL DATA**

Our company retains personal data for the period necessary for the purposes for which they were processed and the minimum period stipulated in the relevant legal regulations. In this regard, our company first determines whether there is a specified period for the storage of personal data in the relevant legislation, and if a period is specified, it complies with that period. If there is no legal period, personal data is stored for the duration necessary for the purposes for which they were processed. At the end of the determined storage periods, personal data is destroyed through periodic destruction periods or in accordance with data subject requests, using specified destruction methods (deletion

and/or destruction and/or anonymization). Details on this matter are outlined in the Personal Data Storage and Destruction Policy.

## **7) DATA PROTECTION MATTERS**

Our company, in accordance with Article 12 of the Law, takes necessary measures to prevent the unlawful disclosure, access, transfer, or any other security vulnerabilities that may occur concerning personal data, depending on the nature of the data to be protected. In this context, our company takes administrative measures to ensure the required security level, as recommended by the Board, and conducts or has audits carried out.

Within this framework, the technical and administrative measures taken by our company for the protection of personal data are meticulously applied, especially for sensitive personal data.

### **7.1. TECHNICAL MEASURES TO ENSURE LAWFUL PROCESSING OF PERSONAL DATA AND PREVENT UNLAWFUL ACCESS TO PERSONAL DATA**

To ensure the lawful processing of personal data, our company takes technological and administrative measures according to technological capabilities and application costs.

The main technical measures taken by our company to ensure the lawful processing of personal data are listed below:

- Network security and application security are maintained.
- Security measures are taken within the scope of the supply, development, and maintenance of information technology systems.
- Security of personal data stored in the cloud is ensured.
- Access logs are regularly maintained.
- Up-to-date antivirus systems are used.
- Firewalls are implemented.
- Necessary security measures are taken for entry and exit into physical environments containing personal data.
- Security against external risks for physical environments containing personal data is ensured.
- The security of environments containing personal data is maintained.
- Personal data is backed up, and the security of the backed-up personal data is ensured.
- Log records are maintained without user intervention.
- Intrusion detection and prevention systems are used.
- Penetration testing is applied.
- Cybersecurity measures are taken and continuously monitored.
- Encryption is applied.
- Specialized support is obtained from a private company regarding technical matters.

- Data loss prevention software is used.

## **7.2. ADMINISTRATIVE MEASURES TO ENSURE LAWFUL PROCESSING OF PERSONAL DATA AND PREVENT UNLAWFUL ACCESS TO PERSONAL DATA**

The main administrative measures taken by our company to ensure the lawful processing of personal data are listed below:

- Corporate policies have been prepared and implemented regarding access, information security, use, storage, and disposal.
- Confidentiality commitments are made with company personnel.
- The authorities of employees undergoing changes in duties or leaving the company in this field are revoked.
- Contracts signed include data security provisions.
- Issues related to personal data security are rapidly reported.
- Monitoring of personal data security is conducted.
- Personal data is minimized whenever possible.
- Employees are informed and trained on the protection of personal data law and the lawful processing of personal data.

Records are created, maintained, and audits are carried out in contracts and documents governing the legal relationship between our company and employees, placing obligations not to process, disclose, or use personal data, except for the exceptions brought by the company's instructions and the law.

## **8) RIGHTS OF DATA SUBJECTS AND EXERCISING THESE RIGHTS**

### **8.1. Rights of Data Subjects**

Data subjects have the following rights:

- To learn whether personal data is being processed,
- To request information if personal data has been processed,
- To learn the purpose of the processing of personal data and whether they are used in accordance with that purpose,
- To know third parties, whether domestically or abroad, to whom personal data is transferred,
- To request the correction of personal data in case it is incomplete or inaccurately processed, and to request notification of this correction to third parties to whom the personal data has

- been transferred,
- To request the deletion or destruction of personal data in case the reasons requiring the processing cease to exist, despite being processed in accordance with the Law and other relevant laws, and to request notification of this deletion to third parties to whom the personal data has been transferred,
  - To object to the occurrence of a result against the person by objecting to the processing of the processed data exclusively through automated systems,
  - To demand compensation for damages in case of harm due to the unlawful processing of personal data.

## **8.2. Exercising the Rights of Data Subjects**

Data subjects can submit their requests related to the rights listed in section 7.1 to our company using the methods determined by the Board. In this context, they can benefit from the "Data Subject Application Form," which can be accessed at [www.umsmetal.com.tr](http://www.umsmetal.com.tr).

## **8.3. Response to Applications by Our Company**

Our company takes necessary administrative and technical measures to conclude the applications made by data subjects in accordance with the Law and secondary legislation.

If the data subject submits their request regarding the rights mentioned in Section 8.1 to our Company in accordance with the procedure, our Company will conclude the relevant request free of charge as soon as possible and at the latest within 30 (thirty) days, depending on the nature of the request. However, if the process requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board.

## **9) EFFECTIVENESS, UPDATING, AND COMPLIANCE OF THE POLICY**

This Policy, organized by our company, has come into effect on the day it is published on the website. This Policy is reviewed as needed, and the necessary sections are updated. Our company reserves the right to make changes to the Processing and Protection of Personal Data Policy or the Personal Data Storage and Destruction Policy due to changes in the law, decisions of the Authority, or developments in the field of information technology or the industry. Changes made to these policies are immediately incorporated into the text, and explanations regarding the changes are provided at the end of the policy.

## **CONTACT INFORMATION AS THE DATA CONTROLLER**

UMS Uđur Metal Sanayi A.Ş.

MERSIS No: 0892009706900011

Contact Link: [www.umsmetal.com.tr](http://www.umsmetal.com.tr)

Phone Number: +90 312 354 01 06

Email Address: [ums@umsmetal.com.tr](mailto:ums@umsmetal.com.tr) - [umsmetal@hs01.kep.tr](mailto:umsmetal@hs01.kep.tr)

Address: 1208. Street No: 6-8D-8E Ostim, Ankara / Turkey

