

GENERAL INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA

As Üstüniş Makina San. ve Tic. A.Ş. (“Üstüniş Makina”), in accordance with the Law on the Protection of Personal Data No. 6698 (“KVKK”) and relevant legislation and legal regulations, we have prepared this privacy notice to inform you, our Visitors, Online Visitors, Customers, Potential Customers, Supplier Employees and Supplier Representatives regarding the processing, storage and transfer of your personal data.

1. What categories of personal data do we process, and for what purposes do we process them?

Your personal data is processed by Üstüniş Makina San. ve Tic. A.Ş. in accordance with Article 4.2 of the Personal Data Protection Law;

- (i) Compliance with the law and the principles of good faith,
- (ii) Accuracy and, where necessary, up-to-date status,
- (iii) Processing for specific, explicit and legitimate purposes,
- (iv) Processing that is relevant, limited and proportionate to the purpose for which it is carried out,
- (v) Retention for the period required by applicable legislation or necessary for the purpose for which it is processed,

In accordance with our principles, personal data collected within the scope of the business relationships we have established and maintain with our business partners (a person may fall into more than one category) may be processed for the purposes set out below.

A. Our visitors

Our visitors’ personal details (e.g. first name, surname), physical premises security information (e.g. CCTV footage);

- a) the creation and monitoring of visitor records,
- b) ensuring the security of the physical premises.

B. Our Online Visitors

Transaction security information (e.g. your IP address), marketing information (cookie records) and (if you provide them to us*) personal identification details and contact details (e.g. your email address, telephone number) of our online visitors who use our website;

- a) ensuring that activities are carried out in accordance with the law,
- b) implementing information security processes,
- c) following up on requests and complaints,
- d) carrying out communication activities,
- e) providing information to authorised persons, bodies and organisations,
- f) enabling you to access our website via the internet.

C. Our customers

The identity details, contact details, customer transaction details (e.g. order details), physical premises security details, financial details (e.g. balance sheet details), legal transaction details and marketing details (e.g. purchase history details) of our individual customers or the authorised representatives and/or employees of our corporate customers;

- a) ensuring that activities are carried out in accordance with the law,
- b) managing financial and accounting matters,
- c) managing/monitoring business operations,
- d) managing logistics operations,
- e) providing after-sales support services for goods and services,
- f) the execution of goods/services sales processes,
- g) the execution of marketing analysis activities,
- h) the execution of contract processes,
- i) the provision of information to authorised persons, institutions and organisations,
- j) the provision of physical premises security,
- k) the resolution of legal disputes,
- l) the conduct of storage and archiving activities,
- m) the conduct of risk management processes,
- n) the conduct of advertising/campaign/promotion processes, and the sending of commercial electronic communications,
- o) the conduct of customer loyalty processes relating to the company, products and services,

p) the conduct of communication activities.

D. Our Potential Customers

The identity details, contact details, customer transaction details, physical premises security details and marketing details of our individual customers or the authorised representatives and/or employees of our corporate customers;

a) managing the processes relating to the sale of goods and services,

b) administering contractual processes,

c) ensuring the security of physical premises,

d) administering advertising, campaign and promotional processes, and sending commercial electronic communications,

e) conducting marketing analysis.

E. Our Supplier Employees

Our supplier's employees' personal details, contact details, physical premises security details, and professional experience details (e.g. on-the-job training details);

a) the conduct of communication activities,

b) the conduct/supervision of business operations,

c) ensuring the security of physical premises,

d) the conduct of supply chain management processes,

e) the conduct of logistics activities,

f) ensuring that activities are conducted in compliance with legislation,

g) the conduct of occupational health and safety activities.

F. Our Supplier Representative

The identity details, contact details, physical premises security details, customer transaction details, financial details, marketing details and legal transaction details of our individual suppliers or authorised representatives of our corporate suppliers;

- a) the conduct/supervision of business operations,
- b) the conduct of procurement processes for goods and services,
- c) the conduct of financial and accounting matters,
- d) the conduct of contractual processes,
- e) the conduct of investment processes,
- f) ensuring the security of physical premises,
- g) the monitoring and conduct of legal matters.

2) How is your personal data collected?

Your personal data, as listed above by category, is collected through both automated and non-automated means, including physical channels such as order forms, contracts and visitor forms; information systems and electronic devices (e.g. telecommunications infrastructure, computers and telephones); third parties (e.g. KKB and Findeks); our website; and other documents provided by the data subject.

3) What is the legal basis for the collection of your personal data?

Your personal data is processed by Üstüniş Makina San. ve Tic. A.Ş. in accordance with Article 5 of the Personal Data Protection Law (KVKK) for the purposes set out above;

- (i) Where expressly provided for by law,
- (ii) Where necessary for the processing of personal data relating to the parties to a contract, provided that such processing is directly related to the conclusion or performance of the contract,
- (iii) Where necessary for the data controller to comply with a legal obligation,
- (iv) Where the processing of data is necessary for the establishment, exercise or defence of a legal claim,
- (v) Where the processing of data is necessary for the legitimate interests of the data controller, provided that such processing does not infringe upon the fundamental rights and freedoms of the data subject, the data is processed on these legal grounds.
- (vi) The identity and contact details of our customers and potential customers will be processed, based on their explicit consent, for the purposes of advertising, campaigns, promotions and the sending of commercial electronic communications.

4) Do we transfer your personal data to a third party?

- a) Personal data relating to our visitors may be shared with law enforcement agencies and judicial authorities for the purpose of resolving legal disputes and where required by applicable legislation.
- b) Personal data relating to our online visitors may be shared with judicial authorities and competent public bodies and institutions for the purpose of resolving legal disputes and where required by applicable legislation.
- c) Personal data belonging to our customers is disclosed to authorised public institutions and organisations, within the scope prescribed by legal regulations, for the purposes of conducting operations in compliance with legislation, monitoring and managing legal affairs, and providing information to authorised persons, institutions and organisations; and to our group companies, IT companies, suppliers, courier companies, insurance companies, banks and financial advisors, to the extent necessary for the conduct/supervision of business operations, the implementation of risk management processes, and to ensure our services are performed as required, to the extent necessary, to our group companies, IT companies, suppliers, courier companies, insurance companies, banks and our financial advisor. Furthermore, such personal data may be transferred to the law firm we engage and to judicial authorities for use as evidence in any future legal disputes.
- d) Personal data relating to our potential customers may be transferred to the law firm we engage and to judicial authorities so that it may be used as evidence in any future legal disputes.
- e) Personal data relating to our supplier's employees, within the scope prescribed by law, to ensure the lawful conduct of operations, the monitoring and handling of legal matters, the provision of information to authorised persons, bodies and organisations, and the conduct/supervision of business activities; and to the extent necessary to ensure the proper performance of the service, to group companies, IT companies, suppliers, courier companies, banks and our financial adviser. Furthermore, the aforementioned personal data may be transferred to the law firm we engage and to judicial authorities for the purpose of being used as evidence in any future legal disputes.
- f) Personal data relating to our supplier representatives, within the scope prescribed by legal regulations, to ensure the lawful conduct of operations, the monitoring and handling of legal matters, the provision of information to authorised persons, institutions and organisations, and the conduct/supervision of business activities; and to the extent necessary to ensure the proper performance of the service, to group companies, IT companies, suppliers, courier companies, banks and our financial adviser. Furthermore, the aforementioned personal data may be transferred to the law firm we engage and to judicial authorities for use as evidence in any future legal disputes.

5) Do we transfer your personal data abroad?

As Üstüniş Makina San. ve Tic. A.Ş., your personal data—including your identity, contact details, personal information, professional experience and health data—may be transferred to our clients with whom we have an employment contract, based on your explicit consent, to enable you to work at the premises of clients who also request external assignments.

6) How can you exercise your rights regarding your personal data?

You may submit your requests under Article 11 of the Personal Data Protection Law (KVKK), which governs the rights of data subjects, via the “Data Subject Request Form” available at “www.ustunismakina.com.tr”, in accordance with the “Regulation on the Procedures and Principles for Applications to the Data Controller”, which has been prepared to facilitate your requests.

Data Controller: Üstüniş Makina San. ve Tic. A.Ş.

Address: Velimeşe Mahallesi, Köşk Street, No. 3-5, Ergene, Tekirdağ

Email: kvkk@ustunismakina.com