

Notice for Protection of Personal Data and Confidentiality

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As Aksa Akrilik, we consider the importance of the privacy and security of your personal data. In this context, while conducting our business relations, we would like to inform you about how we process personal data belonging to our customers, suppliers, business partners, their employees and officials and all other third parties, for what purposes we use it and how we protect this information.

All concepts and expressions used in this notification shall express the meaning attributed to them in the Personal Data Protection Law No.6698 ("KVKK") and other legislation. The term "you" in this Notice refers to your person. The term personal data is used to include special quality personal data. The meanings expressed by the terms and abbreviations in the policy are included in the ANNEX – Abbreviations.

We would like to remind you that if you do not accept the notification, you should not forward your personal data to us. If you choose not to provide us with your personal data, in some cases we will not be able to provide you with our services, respond to your requests, or ensure the full functionality of our services.

We would like to remind you that it is your responsibility to ensure that the personal data you transmit to our company are accurate, complete and up to date as far as you know. Beyond that, if you share other people's data with us, it will be your responsibility to collect such data in accordance with local legal requirements. In this case, it will mean that you have obtained all necessary permissions from the third party to collect, process, use and disclose their information, and our Company shall not be held responsible with that respect.

ABOUT AKSA ACRYLIC

Aksa Akrilik Kimya Sanayii A.Ş. Ltd., affiliated to Akkök Holding, one of the leading deep rooted and well-established industrial groups in Turkey, established in 1968 in Yalova to meet acrylic fiber requirements of Turkey began production in 1971 with an annual capacity of 5000 tonnes/year. Over the years, based on its investments and innovations, Aksa has become the world's largest acrylic fiber producer and today it is a world giant with nearly 300 customers in more than 50 countries on 5 continents. Aksa, which provides employment to more than 1,200 employees, on a facility measuring 502 thousand square meters and producing 315,000 tons of fibers per year, in its capacity as the largest throughout the world, is the only acrylic fiber manufacturer in Turkey. In addition to its success in production, Aksa is a pioneer in the sector with its management systems, environmental applications and social responsibility projects, thanks to its wide product range, and supplies technical textile raw materials, providing a wide range of textiles and textile products ranging from carpets to upholstery, from sweaters to socks, from yarns to hand knitting, from velvet to rugs, blankets, awnings and industrial filters.

The expressions of "we" or "Company" or "Aksa Akrilik" in the notification refer to Aksa Akrilik Kimya Sanayii A.Ş. (it relates to personal data processing activities carried out by "Aksa Akrilik") as Data Supervisor.

OUR DATA PROCESSING PRINCIPLES

All personal data processed by our company are processed in accordance with KVKK and the relevant legislation. The basic principles and principles that we consider with utmost importance while processing your personal data in accordance with Article 4 of KVKK are explained below:

- **Processing in Compliance with the Law and the Rules of Honesty:** Our Company 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, our Company takes into account the proportionality requirements in the processing of personal data, and does not use personal data beyond the intended purpose.
- **Keeping Personal Data Accurate and Updated When Required:** Our Company ensures that the personal data it processes is accurate and up to date, taking into account the fundamental rights of personal data owners and their own legitimate interests.
- **Processing for Specific, Clear and Legitimate Purposes:** Our company clearly and precisely defines the purpose of processing legitimate and legal personal data. Our company processes personal data in connection with the products and services it offers and to the extent it is needed with respect thereto.
- **Being Connected, Limited and Measured for the Purpose of Processing:** Our Company processes personal data in a way that is convenient for the realization of the specified purposes and avoids the processing of personal data that are not related to the realization of the purpose or that are not needed.
- **Preserving for the Period Stipulated by the Relevant Legislation or Required for the Purpose of Processing:** Our company retains personal data only for the period specified in the relevant legislation or for the purpose for which they are processed. In this context, our Company first determines whether a period is stipulated for the storage of personal data in the relevant legislation, if a period is specified, it acts in accordance with this period, if a period is not defined, personal data is stored for the period required for the purpose for which they are processed. Personal data are deleted, destroyed or anonymized by our Company if such period expires or the reasons for processing are eliminated.

DATA OWNER CATEGORIES

The categories of data owners, except for employees whose personal data are processed by our company (including interns and sub-employer company employees), are shown in the table below. A separate policy regarding the processing of personal data of our employees has been established and implemented within the company. Persons who fall beyond the following categories can also direct their requests to our Company within the scope of KVKK; the demands of these people will also be evaluated within the scope of the Policy.

CATEGORY OF THE RELATED PERSON	DESCRIPTION
Customer	Real or legal persons purchasing our products and services
Potential Customer	Real or legal persons who have requested to purchase or have an interest in purchasing our products and/or benefiting from our services, or who have been evaluated in accordance with the rules of practice and honesty that they may have this interest therein.
Visitor	Individuals who enter the physical facilities (offices etc.) owned or organized by our company for various purposes or visit our websites
Third Party	Third party individuals (e.g. sureties, companions, family members and relatives) who are associated with these persons in order to ensure the security of the commercial transactions between our Company and the above-mentioned parties or to protect the rights of the said persons and to obtain benefits, or the personal data of our Company, all individuals (e.g. former employees) whom they have to operate for a specific purpose, even if it is not explicitly stated in the Policy.
Candidate Employee / Candidate Intern	Individuals who have applied to our company for a job in any way or who have presented their curriculum vitae and related information to our Company for inspection.
Group Company Employee	Employees and representatives of Aksa Akrilik group companies, which are members of our company
Employees, Shareholders, Authorities of Entities with which We Cooperate	The individuals working and/or who are the shareholders and officials of the companies with which our company has any business relationship (business partners, suppliers, etc.) Individuals whose data are obtained through the business relations of Aksa Akrilik group companies.

WHEN DO WE COLLECT PERSONAL DATA ABOUT YOU?

We collect your personal data mainly in the following situations:

- When you buy or use our products and/or services,
- When you sell goods or provide services to us,
- When you subscribe to our newsletters, choose to receive our marketing messages,
- When you contact us via our website, e-mail, social media platforms, and other online channels or by phone,
- When you apply for a job with our company,
- When you attend our company events and organizations,
- Indirectly, for example, by using "cookies" and customizing the software used to tailor the website to your particular preferences, or monitoring your use of certain pages of the site (e.g., your IP address) or other technical methods that enable us to monitor your use of the site,
- When you contact us for any purpose as a potential customer/supplier/business partner/subcontractor.

We will only process the personal data we obtain in the aforementioned conditions in accordance with this Statement.

WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU?

The personal data we process about you vary according to the type of business relationship between us (e.g., customer, supplier, business partner, etc.) and the method of communicating with us (e.g., telephone, e-mail, website, printed documents, etc.).

Basically, our personal data processing methods are situations where you participate in our business events, competitions, promotions and surveys or interact with us in any other way, via our website, by phone or e-mail, through electronic applications specific to our customers. In this context, the personal data we process about you can be explained under the following categories:

Data Categories	Examples
Identity data	Information on identity documents such as name, surname, title, date of birth
Contact data	Email, phone number, address
Account log-on data	Login ID, password, and other security codes
Photographs or videos that may identify you	Photo and video images and audio data processed when you visit our company for security reasons or when you attend events organized by our company, visual data processed with CCTV records when you visit our company facilities
Financial data	Credit card data, bank account data, accommodation and expenditure information, billing information
Any other data that you decided to share with Aksa Akrilik voluntarily	Information provided for feedback, opinions, requests and complaints, evaluations, comments and evaluations with respect thereto, uploaded files, interests, detailed review process before establishing a business relationship with you, through personal data you share on your own initiative, social media, online platforms or other media
Automatic data collected automatically	When you visit or use our website or applications, subscribe to our newsletters, interact with us through other electronic channels, in addition to the information you directly transmit to us, we may also collect electronic data sent to us by your computer, mobile phone or other access device (e.g. device hardware model, IP address, operating system version and settings, time and time of using our digital channel or product, your actual location that can be collected when you activate location-based products or features, links you click, motion sensor data, etc.)

Data Categories

Examples

Legal procedures and compliance data

Determination and follow-up of our legal receivables and rights and your personal data, audit and inspection data processed within the scope of compliance with our legal obligations and our Company's policies

Corporate customer/Supplier data

As a result of the operations carried out by our business units within the framework of our services, the information obtained and produced about the data owner / supplier or the employee, the signature authority within the customer / supplier,

Event management and security data

Collected information and evaluations about events that have the potential to affect our company's employees, directors or shareholders, license plate and vehicle information, transportation and travel information, airport transportation and transfer organization

Personal data collected from other resources

To the extent permitted by applicable laws and regulations, we may also collect your personal data through public databases, social media platforms, and methods and platforms where our business partners collect personal data on our behalf. For example, before establishing a business relationship with you, we may conduct research about you from public sources to ensure the technical, administrative and legal security of our business activities and transactions. In addition, it may be possible for you to transmit some personal data belonging to third parties to us (For example, personal data of guarantor, companion, family members, etc.). In order for us to manage our technical and administrative risks, we may process your personal data through methods used in these areas in accordance with the generally accepted legal, commercial practice and good faith. In addition, phone, website, etc. We record the personal data you transmit to us on your own initiative through the platforms and process them to solve your requests and problems (e.g., communicating your health problems caused by our products over the phone).

Data Categories

Examples

PROCESSING PERSONAL DATA OF CANDIDATE EMPLOYEES

In addition to the personal data categories listed above, we collect personal data with respect to the school the candidate has graduated, his/her previous work experience, disability status, etc., for understanding the candidate's experience and qualifications and evaluate the suitability thereof for the vacant position, check the accuracy of the information provided if necessary, and conduct research about the candidate by contacting the third parties whose contact information is

given, to communicate with the candidate, to recruit as suitable for the vacant position, to comply with legal regulations and to apply the recruitment rules and human resources policies of our Company,

Personal data of employee candidates, job application form available in written and electronic media, our Company's electronic job application platform, physical or e-mail applications to our Company, employment and consultancy companies, face-to-face or electronic interviews, employee candidate controls are processed by human resources specialists through recruitment tests to assess the candidate's suitability during the recruitment process.

Employee candidates are enlightened in detail with a separate document in accordance with KVKK before submitting their personal data while applying for a job, and their explicit consent is obtained for the necessary personal data processing activities.

OUR POLICY ON COOKIES

For having further information on how we use cookies and other tracking technologies, please read our Cookie Policy at www.aksa.com. Generally, a "cookie" is the name given to the information sent and stored on the user's computer by an Internet service server. The information contained in the cookies can be used when the user returns to the website in question. Cookies may contain various information, including how many times the user entered in the site in question. By using individual session cookies for each user, we can monitor how you use the site during a single session. Thanks to cookies, we can determine which browser you are using and offer you some special services.

Information stored in cookies may include the date of visit, the time of visit, the pages viewed, the time spent in the Online Transactions Center, and the sites visited just before or after the visit to the Online Operations Center. By evaluating the data collected through these cookies used during your visit to the Online Operations Center, you can then display advertisements for products that you may be potentially interested in during your visit to other websites. It is possible to block cookies via your internet browser.

By using the "help" function available in most browsers, you can learn how to prevent your computer from receiving 'cookies ', find out if cookies are sent and disable them completely. However, we would like to remind you that if you disable cookies, you may not be able to use this site fully.

This site uses cookies for a variety of purposes, including:

- Access certain information after entering the site in order to provide you with personalized content;
- Track your preferences when using this site, such as your preferred date and number formats.

We value the privacy of your information. We apply the following rules to protect the privacy and security of your confidential information to the highest possible level:

- This site does not always keep "cookies" on your disk drive. Cookies are removed when you close your browser or leave the site.
- Information in all cookies sent to your computer from this site are sent encrypted format.

PROCESSING THE PERSONAL DATA OF OUR VISITORS AT OUR OFFICES AND FACTORIES

Our company processes personal data for the purpose of ensuring the physical security of our Company, our employees and visitors during the entrance and exit procedures of visitors to its buildings and factories, and to supervise workplace rules. In this context, for the purpose of tracking visitor entry and exit, the name-surname and Turkish ID numbers of our visitors are confirmed with their IDs and recorded in the visitor book. However, the identity of the visitor is not kept during his stay in the company's offices and factories, and the identity is returned to the visitor after the aforementioned entry is made in the visitor book. The visitor is informed about the processing of personal data with an enlightening text at the security entrance before the information is received. However, since our company has a legitimate interest in this context, in accordance with Art. 5/2/f of KVKK, the visitor's express consent is not obtained. These data are only physically kept in the visitor logbook and are not transferred to another medium unless there is a suspicious situation that threatens the Company security. However, this information can be used in cases such as crime prevention and Company security.

In addition, for the purposes specified in the Policy and providing security by our Company; During your stay in our company's offices and factories, internet access is available to our visitors who request access. In this case, the log records regarding your internet access are recorded in accordance with the Law No. 5651 and the mandatory provisions of the legislation regulated according to this law; These records are processed only when requested by the authorized public institutions and organizations or to fulfill our legal obligation in the audit processes to be carried out within the Company.

The log records obtained within this framework can only be accessed by a limited number of Aksa Akriilik employees. Company employees, who have access to the aforementioned records, access these records only for use upon request or audit processes from the authorized public entities and organizations and share them with legally authorized persons.

PROCESSING PERSONAL DATA THROUGH CLOSED CIRCUIT CAMERA RECORDING

Security cameras are used to ensure the security of our company and our facilities and personal data is processed in this way. Our company is aimed to ensure the safety of life and property of the people in it, to prevent abuse, to protect the legitimate interests of data owners, thereby to increase the quality of the service provided, within the scope of surveillance activity using security cameras.

Personal data processing activities performed by our company with security cameras are carried out in accordance with the Constitution, with KVKK, Law No. 5188 on Private Security Services and with the relevant legislation.

Our company processes personally data in a limited and measured manner in connection with the

purpose for which they are processed, in accordance with KVKK Art. 4. The intention is not to monitor the privacy of the person in a way that may result in intervention that exceeds security objectives. In this context, warning signs are placed in common areas where CCTV recording is made and data owners are informed. However, since our company has a legitimate interest in keeping CCTV records, their express consent is not received. In addition, in accordance with Art. 12 of the KVKK, necessary technical and administrative measures are taken to ensure the security of personal data obtained as a result of CCTV monitoring.

In addition, a procedure has been prepared and implemented in the Company, regarding the areas with CCTV cameras, the scope of the areas monitored by the cameras, and the duration of the recording. This procedure is taken into consideration prior to the installation of the CCTV, after which the camera is installed later. It is not allowed to place cameras beyond the security purpose and beyond the privacy of the persons. Only a certain number of Company personnel access CCTV camera images and these authorizations are regularly reviewed. The personnel who have access to these records sign a commitment to protect personal data in accordance with the law.

Image recording is made by means of approximately 500 security cameras located in the service area of the entrance doors, facade of the building, dining hall, cafeteria, visitor waiting room, parking lot, security cabin and floor corridors in our company offices and factories and in order to ensure building security and the recording process is inspected by the Administrative Affairs Management Department.

WHICH PURPOSES DO WE USE YOUR PERSONAL DATA FOR?

Our purposes for using your personal data vary depending on the type of business relationship between us (e.g. customer, supplier, business partner, etc.). Basically, our purposes for processing your personal data are as follows. Personal data processing activities related to Employee Candidates are explained under the "Processing of Personal Data of Employee Candidates" section above.

Aksa Akrilik can process personal data processed by Aksa Akrilik group companies in order to carry out the activities of the group companies in accordance with the principles, goals and strategies of the Aksa Akrilik group of companies and to protect the rights and interests of Aksa Akrilik group of companies. In case personal data sharing between Aksa Akrilik group companies and Aksa Akrilik takes place within the scope of personal data transfer from the data controller to the data controller within the scope of the KVKK, the relevant Aksa Akrilik group company informs the person that the personal data of the data owner can be transferred to Aksa Acrylic.

Objectives of Personal Data Processing

Examples

Assessment of potential suppliers/business partners

Conducting our review and conflict of interest process in accordance with our rules of risk,

Establishment and management of customer relations

Issuance of relevant official documents such as power of attorneys and execution of the relevant process before the notary public for this purpose, establishment and execution of contracts, execution of accounting, invoicing and payment transactions, protection of our rights and obligations on real estate, collection of contractually and commercially required documents, execution of invoicing and payment transactions, contractual and commercially required documents, meeting your requests, ensuring legal and commercial transaction security, establishing and executing contracts, ensuring post-contract legal transaction security, developing products and services, evaluating new technologies and applications, and determining and implementing our company's commercial and business strategies, managing operations (request, proposal, evaluation, order, budgeting, contract), product/project/manufacturing/investment quality processes and operations, internal system and application management operations, finance operations, manageable financial affairs

Conductance and finalization of agreement process with suppliers/business partners

Supply of goods and services, delivery of goods and samples, invoicing, managing the registration process to our website applications, establishing and executing contracts, managing logistics processes, ensuring post-contract legal transaction security, ensuring shipment of goods and samples, managing logistics processes, improving, developing, diversifying our products and services and offer alternatives to entities/individuals with whom they have a commercial relationship, developing products and services, evaluating new technologies and applications, determining and implementing our Company's commercial and business strategies, managing operations (request, offer, evaluation, order, budgeting, contract), product/project/manufacturing/investment quality processes and operations, internal system and application management operations, financial operations, financial affairs management

Conductance of direct marketing processes

Making marketing notifications about our services via e-mail, telephone and SMS, conducting satisfaction surveys or evaluating your opinions, complaints and comments you have made through social media, online platforms or other channels, informing our customers about company innovations, campaigns and promotions, periodically conducting campaigns, organizing special promotional activities for customer profiles and conducting advertising, promotion and marketing activities to be created through customer "classification" and personal

Objectives of Personal Data Processing

Examples

Contact and support (you're your request)

information for preventing the transmission of unsolicited e-mails, determining and implementing our company's commercial and business strategies, organization planning

Responding to information requests about our services, providing support for requests received through our communication channels, updating our records and database

Compliance with legal obligations

Execution of tax and insurance processes, fulfillment of our legal obligations arising from the relevant legislation, especially Law No.5651 and other legislation, Turkish Penal Code No.5237 and Personal Data Protection Law No.6698, carrying out processes before official institutions, auditing and inspecting of official authorities, following and concluding our rights and lawsuits, carrying out the necessary processes within the scope of compliance with the laws and regulations we are subject to such as data disclosure upon the request of official authorities, regulatory and supervisory institutions, as required or required by legal regulations, the requirement determined to ensure the fulfillment of the legal obligations specified in the KVKK and within the scope of obligations,

Protection of corporate benefits and providing corporate security

Carrying out necessary audit activities to protect the interests and benefits of the company, conducting conflict of interest controls, ensuring the legal and commercial security of the people in business relations with our company, keeping CCTV records for the protection of company devices and assets, taking technical and administrative security measures, conducting post-stay satisfaction surveys, carrying out the work necessary for the development of the services we offer, implementing and supervising workplace rules, managing quality processes, planning and executing social responsibility activities, protecting the commercial reputation and trust created by Akxa Acrylic group companies, all incidents, accidents, complaints, losses and thefts occurring in the construction site and building etc., making necessary interventions and taking measures by reporting the situations, transferring the rules to be followed for dangerous situations that may occur during maintenance and repair and measuring the professional competence of subcontractors, ensuring the order of the entrance and exit of the company employees and obtaining the necessary information in terms of security, carrying out the necessary quality and standard audits, or fulfilling our reporting and other obligations determined by laws and regulations, ensuring the execution of commercial activities that require the participation of Akkök Holding group companies.

Objectives of Personal Data Processing

Examples

Planning and performance of commercial activities of the company

Budgeting, in line with the purpose of determining, planning and applying the commercial policies of the Company in the short, medium and long term, determining and implementing commercial and business strategies; communication, market research and social responsibility activities carried out by our company, procurement, Power Plant Improvement and Efficiency Projects, uninterrupted and economical execution and distribution of the needs required for all companies in the campus, realizing sales with free consumers, monitoring, reporting and computing metering instruments

Reporting and auditing

Providing communication with domestic Akkök Holding group companies, carrying out necessary activities, internal audit and reporting processes

Protection of rights and benefits

Lawsuits, investigations, etc. against our company. defense against legal claims

HOW DO WE USE YOUR PERSONAL DATA FOR MARKETING PURPOSES?

Since marketing activities are not considered within the scope of the exceptions regulated on Articles 5/2 and 6/2 of KVKK, as a rule, we always obtain your consent to process your personal data within the scope of marketing activities, Our company may send you regular promotional communications about its products, services, events and promotions. Such promotional communications may be sent to you via different channels such as email, phone, SMS text messages, mail and third party social networks.

In order to provide you with the best personalized experience, sometimes these communications may be adapted to your preferences (for example, based on the results we derive from your website visits or on links you click in our emails, as you tell us about them).

We can carry out marketing activities in order to do so based on your consent, processing for the purpose of offering you special products and services such as Internet advertising, Targeting, Re-targeting, cross-selling, campaigns, opportunity and product/service advertisements, using Cookies for this purpose, making commercial offers considering your preferences and recent purchases to follow your usage habits according to your previous records and to offer you special products; for the purpose of presenting you special advertisements, campaigns, advantages and other benefits and carrying out other marketing and studies, processing for the creation of new product and service models, organizing corporate communication and other events and invitations in this context, and informing about them.

When required by the applicable legislation, we will ask for your consent before starting the above activities. You will also be given the opportunity to withdraw (stop) your consent at any time. In particular, you can always stop marketing-related notifications from being sent to you by following the unsubscribe instructions included in each email and SMS message.

If you log into an Aksa Akrilik account, you may be given the option to change your communication preferences under the relevant section of our website or application. You can always contact us to stop sending marketing-related communications (contact details can be found in the section "What Are Your Rights Regarding Your Personal Data?" below).

FOR WHAT LEGAL REASONS DO WE PROCESS YOUR PERSONAL DATA?

We process your personal data based on the following legal reasons as regulated by Art. 5 of KVKK, mainly pursuant to the Turkish Commercial Code No. 6102, Turkish Code of Obligations No. 6098, Tax Procedures Law No. 213:

Legal Reasons

We process data based on your consent where we are required to obtain your consent pursuant to KVKK and other legislation (we remind you that you can anytime withdraw your consent)

In any case allowed by the valid legislation

When it is necessary to protect vital benefits of any person

When we are required to execute an agreement with you and perform the terms of the agreement and satisfy our liabilities thereunder

Satisfying our legal obligations,

If you have publicized your personal data

Necessity for data processing for establishment or protection of a right, exercising our legal rights and defending against legal claim filed against us

Examples

We obtain your consent to conduct our marketing activities.

Inserting the name of the related person on the invoice under Art. 230 of the Tax Procedures Code

Providing a physician the health data of a director who fainted in a Board meeting

Obtaining bank account data of the customer under contractual relations with the customer

Satisfying our tax liabilities, presenting to the court the information requested by a court decision

Your e-mail message asking us to contact you, the employment candidate writes his/her contact data in the website where applications for job are collected, using the data publicized by you through social media channels, etc. in line with the objective of publicizing

Retaining and using whenever necessary documents which are classified as evidence

Legal Reason

Whenever necessitated by our legitimate interests provided that your basic rights and freedoms are not jeopardized

Examples

Providing the security of corporate communication networks and information, conducting our corporate activities, detect doubtful transactions and investigating for compliance with our risk rules, using various services for providing IT services in terms of technical and security measures, including storage, sheltering, maintenance, support, etc., using cloud technology for providing productivity of our corporate activities and benefiting from technological opportunities

We would like to emphasize that if your Personal Data is processed on the basis of your explicit consent, and if you withdraw your express consent, you will be removed from the commercial membership program where such explicit consent processing is required, and that you will not be able to benefit from the advantages you have benefited from as of the relevant date.

WHEN DO WE SHARE YOUR PERSONAL DATA?

Transfer of Personal Data Domestically

Our company is under responsibility of acting in accordance with the decision and relevant regulations stipulated in KVKK, particularly Art. 8, and the respective Board resolution with respect to transfer of personal data. As a rule, personal data and private data which belong to data owners cannot be transferred by our Company to other individuals or entities without the express consent of the data subject.

In addition, in any case as stipulated in articles 5 and 6 of the KVKK, transfer is possible without the consent of the person concerned. Our company may transfer personal data to third parties in Turkey and companies under the roof of Akxa Akriilik, in accordance with the conditions stipulated in the KVKK and other relevant legislation, and by taking the security measures specified in the legislation (If there is a contract executed by and between the person who owns the data and Akxa, as specified in the said contract), unless otherwise regulated in the Law or in other relevant legislation.

Parties With Whom Data is Shared Locally and in Abroad

We share your personal data only if necessary for the following purposes. Except for the conditions specified below, we take special care not to share your personal data. The parties with whom we share personal data are as follows:

- **Akkök Holding group companies:** Your personal data can be shared with or made accessible to Akkök Holding group companies that we are affiliated to. This sharing will only be made with authorized employees in the relevant Akkök Holding group company. In some special cases, instead of sharing anonymous information with Akkök Holding group

companies, we may share personal data (such as sharing damage information to open an insurance claim file). An Agreement has been signed for Akkök Holding Data Sharing, with respect to transfer of your personal data to Akxa Akrilik group companies and necessary measures have been implemented.

- **Service providers and business partners:** It defines the parties with which our company establishes business partnerships for purposes such as sales, promotion and marketing of our Company's services, after-sales support, while conducting its commercial activities. Like many businesses, we may work with reliable third parties such as information and communication technology providers, consultancy service providers, cargo companies, travel agencies to ensure that functions and services are carried out in the most efficient and up-to-date manner within the scope of some data processing activities, and we can share data to carry out our activities in this context. This sharing is limited in order to ensure the fulfillment of the establishment and performance purposes of the business partnership. We use cloud computing technologies in order to carry out the activities of our company in the most efficient way and to benefit from the possibilities of technology at the maximum level, and within this scope, we can process your personal data domestically and abroad through companies offering cloud computing services. The marketing services support firm we share the data with may be established abroad and in this context, data sharing is carried out in abroad in accordance with the provisions regarding data sharing abroad, including Articles 8 and 9 of KVKK.
- **Government authorities:** When required by law or when we need to protect our rights, we may share your personal data with relevant official, judicial and administrative authorities (e.g. tax offices, law enforcement agencies, courts and enforcement offices).
- **Private law persons:** Private law persons authorized to receive information and documents from our Company in accordance with the provisions of the relevant legislation can share personal data with a limited purpose within their legal authority (e.g. Occupational Health and Safety Company).
- **Professional advisors:** We may share your personal data with professional advisors such as banks, insurance companies, auditors, lawyers, financial advisors and other consultants.
- **Other persons associated with corporate transactions:** from time to time we may share your personal data for the conduct of corporate transactions such as the sale of a business owned by our company, reorganization, merger, joint venture, or other disposition of our business, assets or shares (including those in connection with any bankruptcy or similar process).

HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

We only retain your personal data for as long as necessary to fulfill the purpose for which it was collected. We determine these periods separately for each business process and if there is no other reason to retain your personal data at the end of the relevant periods, we destroy your personal data in accordance with KVKK.

While determining the destruction periods of your personal data, we take into consideration the following criteria:

- The period accepted as a general practice in the sector in which the data controller operates within the scope of the processing of the relevant data category,
- The period that requires the processing of personal data in the relevant data category and the legal relationship established with the relevant person will continue,
- The period during which the legitimate interest to be obtained by the data controller will be valid in accordance with the law and good faith, depending on the purpose of processing the relevant data category,
- The period during which risks, costs and responsibilities to be created by retaining the relevant data category depending on the purpose of processing,
- Whether the maximum period to be determined is suitable for retaining the relevant data category accurate and up-to-date when necessary,
- The period during which the data controller is obliged to keep personal data in the relevant data category in accordance with his legal obligation,
- The limitation period determined by the data controller for asserting a right based on personal data in the relevant data category.

HOW DO WE DISPOSE OF YOUR PERSONAL DATA?

Although personal data has been processed in accordance with the provisions of the relevant law in accordance with Article 138 of the Turkish Criminal Code and Article 7 of the KVKK, in case the reasons for processing disappear, it will be deleted, destroyed or anonymized based on our Company's own decision or if the personal data owner has made any request with that respect.

In this context, Personal Data Storage and Disposal Policy have been prepared. Our company reserves the right not to fulfill the request of the data owner in cases where it has the right and/or obligation to preserve personal data in accordance with the provisions of the relevant legislation. When personal data are processed by non-automatic means, provided that they are part of any data recording system, the system of physical destruction of personal data so that it cannot be used later is applied while the data is deleted/destroyed. When our company agrees with a person or organization to process personal data on its behalf, the personal data is securely deleted by these persons or organizations in a way that cannot be recovered. Our company can anonymize personal data when the reasons requiring the processing of personal data processed in accordance with the law disappear.

HOW DO WE PROTECT YOUR PERSONAL DATA?

Necessary administrative and technical measures are taken by our Company in line with the Personal Data Security Guide published by the KVK Agency in order to protect your personal data and prevent unauthorized access; procedures are arranged within the Company with that respect, clarification and explicit consent texts are prepared in accordance with Art. 12/3 of KVKK; necessary inspections are carried out or outsourced to ensure the implementation of the provisions of the KVKK. These audit results are evaluated within the scope of the internal functioning of the Company and necessary actions are taken to improve the measures taken.

Your personal data mentioned above can be transferred to the physical archives and information systems of our Company and/or our suppliers and kept in both digital and physical environment. The technical and administrative measures taken to ensure the security of personal data are explained in detail below under two headings.

Technical Measures

We use generally accepted standard technologies and business security methods, including standard technology called Secure Socket Layer (SSL), for the protection of personal information collected. However, due to the nature of the Internet, information can be accessed by unauthorized persons over networks without the necessary security measures. Depending on the current state of technology, the cost of technological implementation and the nature of the data to be protected, we take technical and administrative measures to protect your data from risks such as destruction, loss, tampering, unauthorized disclosure or unauthorized access. In this context, we conclude agreements regarding data security with the service providers we work with.

- 1) Ensuring Cyber Security: We use cyber security products to ensure personal data security, but the technical measures we take are not limited thereto. With measures such as firewall and gateway, the first line of defense against attacks from environments such as the Internet is established. However, almost all software and hardware are subjected to some installation and configuration processes. Considering that some commonly used software, especially former versions, may have documented security vulnerabilities, unused software and services are removed from the devices. For this reason, deletion of unused software and services rather than keeping them up-to-date is preferred primarily because of its simplicity. With patch management and software updates, it is ensured that the software and hardware work properly and that the security measures taken for the systems are checked regularly.
- 2) Access Limitations: Access authorizations to systems containing personal data are restricted and regularly reviewed. In this context, employees are given access to the extent necessary for their job and duties, as well as their powers and responsibilities, and access to relevant systems is provided by using a username and password. While creating the said passwords and passwords, it is ensured that combinations of uppercase and lowercase letters, numbers and symbols are preferred instead of numbers or letter strings that are associated with personal information and are easy to guess. Accordingly, access authorization and control matrix is created.
- 3) Encryption: In addition to the use of strong passwords and encryptions, limiting the number of password entry attempts to protect against common attacks such as the use of brute force algorithm (BFA), ensuring that passwords and encryptions are changed at regular intervals, opening the administrator account and admin authority only when needed and for employees who are dismissed from the data controller, access is restricted by methods such as deleting the account or closing the entries without losing time.
- 4) Anti Virus Software: In order to protect against malicious software, products such as antivirus and antispam are used that regularly scan the information system network and detect threats, and they are kept up to date and the required files are regularly scanned. If personal data is to be obtained from different websites and/or mobile application channels, it is ensured that the connections are made via SSL or a more secure way.
- 5) Monitoring Personal Data Security: The process of monitoring the personal data consists of checking which software and services are running in information networks, determining whether there is an infiltration or non-infiltration in information networks, recording transactions of all users (such as log records), immediate reporting of security problems. Again, a formal reporting procedure is established for employees to report security weaknesses in systems and services or threats that use them. Evidence is collected and securely stored in unwanted events such as the collapse of the information system, malicious software, denial of service attack, incomplete or incorrect data entry, violations that disrupt privacy and integrity, and abuse of the information system.

- 6) Ensuring the Security of Media Containing Personal Data: If personal data is stored on devices located in the campuses of data controllers or in paper medium, physical security measures are taken against threats such as theft or loss of these devices and papers. Physical environments containing personal data are protected against external risks (fire, flood, etc.) with appropriate methods and entry/exit to these environments is controlled.

Measures at the same level are also taken for paper media, electronic media and devices located outside the Company campus and containing personal data belonging to the Company. As a matter of fact, although personal data security violations often occur due to the theft and loss of devices containing personal data (laptop, mobile phone, flash disk, etc.), personal data to be transferred by e-mail or mail are also sent carefully and with sufficient precautions. In case the employees gain access to the information system network with their personal electronic devices, adequate security measures are also taken therefor.

The method of using access control authorization and/or encryption methods is applied against cases such as the loss or theft of devices containing personal data. In this context, the password key is stored in an environment that can only be accessed by authorized persons and unauthorized access is prevented.

Paper documents containing personal data are also stored in a locked manner and in environments accessible only to authorized persons, and unauthorized access to such documents is prevented.

If the personal data is obtained by others through illegal means, the Company notifies the case to KVK Board and data owners as soon as possible, pursuant to , Art. 12 of the KVKK, The KVK Board may announce this on the website or by any other method if it deems necessary.

- 7) Procurement, Development and Maintenance of Information Technology Systems: Security requirements are taken into consideration while determining the needs of the company regarding the procurement, development or improvement of existing systems.
- 8) Backing Up Personal Data: In cases where personal data is damaged, destroyed, stolen or lost for any reason, the Company ensures that the data is backed up as soon as possible. Backed up personal data can only be accessed by the system administrator, and data set backups are excluded from the network.

Administrative Measures

- All activities carried out by our company were analyzed in detail for all business units and as a result of this analysis, a process-based personal data processing inventory was prepared. Risk areas in this inventory are identified and necessary legal and technical measures are taken continuously. (For example, the documents to be prepared within the scope of KVKK have been prepared by considering the risks in this inventory.)
- Personal data processing activities carried out by our company are audited by information security systems, technical systems and legal methods. Policies and procedures regarding personal data security are determined and regular controls are carried out within this scope.
- Our company may receive services from external service providers from time to time in order to meet its information technology needs. In this case, the transaction is made by making sure that the said Data Processing external service providers at least meet the security measures provided by our Company. In this case, at least the following issues are included in this contract

executed by and between the Company and the Data Processor in writing:

- The Data Processor acts in accordance with the data processing purpose and scope specified in the contract only in accordance with the instructions of the Data Controller, and in accordance with the KVKK and other legislation,
 - Acting in accordance with the Personal Data Storage and Destruction Policy,
 - The Data Processor is subject to the indefinite confidentiality obligation regarding the personal data it processes,
 - In case of any data breach, the Data Processor is obliged to notify the Data Supervisor immediately of this situation,
 - Our Company will carry out the necessary audits on the systems of the Data Processor that contain personal data, and may examine the reports and the service provider company on site,
 - It will take necessary technical and administrative measures for the security of personal data and
 - In addition, as the nature of the relationship between the Data Processor and us permits, the categories and types of personal data transferred to the Data Processor are also specified in a separate article.
- As the Institution emphasizes in its guides and publications, personal data is reduced as much as possible within the framework of the principle of data minimization, and unnecessary, outdated data not serving any purpose is not collected, and if it was collected in the period before the KVKK, it is destroyed upon a complaint under the Personal Data Storage and Disposal Policy.
 - Personnel who are experts in technical matters are employed.
 - Our company has determined provisions regarding confidentiality and data security in the Employment Agreements to be signed during the recruitment process of its employees, and asks employees to comply with these provisions. Employees are regularly informed and trained on the law on protection of personal data and taking necessary measures in accordance with this law. The roles and responsibilities of the employees were reviewed within this scope and their job descriptions were revised.
 - Technical measures are taken in line with technological developments, the measures taken are periodically checked, updated and renewed.
 - Access authorizations are limited, authorities are regularly reviewed.
 - The technical measures taken are regularly reported to the officer, and efforts are made to produce the necessary technological solutions by reviewing the issues that pose risks.
 - Software and hardware including virus protection systems and firewalls are installed.
 - Backup programs are used to ensure the safe storage of personal data.
 - Security systems for storage areas are used, technical measures taken are periodically reported to the relevant person as required by internal controls, issues that pose a risk are re-evaluated and necessary technological solutions are produced. The files/outputs stored in the physical environment are kept by the supplier companies and then destroyed in accordance with the determined procedures.
 - The issue of Personal Data Protection is also owned by the senior management, a special Committee has been established (KVK Committee) and started to work. A management policy regulating the working rules of the Company's KVK Committee has been put into effect within the Company and the duties of the KVK Committee have been explained in detail.

HOW DO WE PROTECT YOUR SPECIAL QUALITY PERSONAL DATA?

A separate policy regarding the processing and protection of sensitive personal data has been prepared and put into effect.

Art. 6 of the KVKK has regulated as special qualified personal data, the data related to the race,

ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, costume and dress, associations, foundations or union membership, health, sexual life, criminal conviction and security measures as well as biometric and genetic data, since they have the risk of causing victimization or discrimination when processed inappropriately, and the processing of these data is subject to a more sensitive protection.

Our company informs the Relevant Persons during the acquisition of special quality personal data in accordance with Article 10 of the KVKK. Special quality personal data are processed by taking measures in accordance with the KVKK and by carrying out the necessary inspections. As a rule, one of the conditions for processing special personal data is the explicit consent of the data owner. Our company offers data owners the opportunity to express their explicit consent on a specific subject, based on information and with free will.

As a rule, our company obtains the express consent of the Relevant Persons in writing for the processing of special quality data. However, pursuant to Art. 6/3 of the KVKK, in the presence of any of the conditions specified in Art. 5/2 of the KVKK, the explicit consent of the Related Persons is not required. Besides, Art. 6/3 of the KVKK regulates that the personal data it can be processed without seeking consent. Regardless of the reason, general data processing principles are always taken into account in processing processes and compliance with these principles is ensured.

Our company takes special measures to ensure the security of sensitive personal data. In accordance with the principle of data minimization, special quality personal data are not collected unless it is necessary for the relevant business process and is processed only when necessary. In case of processing special quality personal data, necessary technical and administrative measures are taken to comply with legal obligations and to comply with the measures determined by the KVK Board.

WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

Pursuant to Art. 11 of the KVKK, as data subjects, you have the following rights with respect to your personal data:

- Learning whether your personal data is processed by our Company,
- If your personal data has been processed, to request information regarding thereto,
- Learning the purpose of processing your personal data and whether they are used appropriately for their purpose,
- Knowing the third parties in the country or abroad to whom your personal data has been transferred,
- Requesting correction of your personal data in case of incomplete or incorrect processing, and requesting notification of the transaction made within this scope to third parties to whom your personal data has been transferred,
- Requesting the deletion or destruction of your personal data in the event that the reasons requiring its processing disappear, despite the fact that it has been processed in accordance with the provisions of KVKK and other relevant laws, and requesting the third parties to whom

your personal data is transferred to

- Objecting to the emergence of a result against you by analyzing the processed data exclusively through automated systems,
- Requesting the compensation of the damage you suffered in case you suffer damage due to unlawful processing of your personal data.

You can send these requests to our Company free of charge in accordance with the Application Communiqué by the method stated below:

- 1) Fill out the form on www.aksa.com and sign it with wet signature, and send it to Akxa Akrilik A.Ş Merkez Mahallesi Yalova-Kocaeli Yolu Caddesi No: 34 Taşköprü, 77040 Çiftlikköy/ Yalova (we would like to remind you that your identity will need to be presented).
- 2) Fill out the form on www.aksa.com and sign it with wet signature and send it to Akxa Akrilik A.Ş Merkez Mahallesi Yalova-Kocaeli Yolu Caddesi No: 34 Taşköprü, 77040 Çiftlikköy / Yalova via a public notary.
- 3) Filling out the application form at www.aksa.com and signing with your "secure electronic signature" under the Electronic Signature Law No. 5070, and sending the secure electronic signed form to the address aksaakrylic@hs02.kep.tr by registered e-mail.
- 4) Submission in writing using your e-mail address previously notified to our company and registered in our Company's system.

In the application;

Name, surname, and the signature if application is written, Turkish ID number for the citizens of the Republic of Turkey, nationality for foreigners, passport number or identification number, if any, place of residence or workplace address for notification, e-mail address for notification, telephone and fax number, subject of request must be specified on the application form. Information and documents on the subject are also attached to the application form.

It is not possible to make requests by third parties on behalf of personal data subjects. In order for a person other than the personal data owner to make a request, a wet signed and notarized copy of the special power of attorney issued by the personal data owner in the name of the person who will make the application must be available. In the application containing your explanations regarding the right you have as a personal data owner and that you will make to exercise your rights stated above and that you request to use. the subject you request must be clear and understandable, the subject you request must be related to your person, or if you are acting on behalf of someone else, you must be specially authorized and document your authorization, the application must include your identity and address information, and documents certifying your identity must be attached to the application.

Applications made within this scope will be finalized in the shortest possible time frame and not later than within 30 days. These applications are made free of charge. However, if the transaction requires an additional cost, the fee in the tariff determined by the KVK Board may be charged.

If the personal data owner submits his request to our Company in accordance with the

prescribed procedure, our Company will conclude the relevant request free of charge as soon as possible and not later than within thirty days, depending on the nature of the request. However, in case the transaction requires an additional cost, the fee in the tariff determined by the KVK Board will be collected from the applicant by our Company. Our company may request information from the person concerned in order to determine whether the applicant is the owner of personal data. In order to clarify the matters included in the application of the personal data owner, our company may ask a question to the personal data owner about his application.

If your application is rejected by our Company pursuant to Art. 14 of the KVKK, you find our answer inadequate or we do not reply to the application in time, you can complain to the KVK Board within thirty days from the date you learn the response of our company, and in any case, within sixty days from the date of application.

WHAT ARE THE SITUATIONS WHERE DATA OWNERS CANNOT EXECUTE THEIR RIGHTS?

Personal data owners cannot claim the above-mentioned rights of personal data owners in these matters, since the following situations are excluded from the scope of KVKK in accordance with Article 28 of the KVKK:

- Processing personal data for purposes such as research, planning and statistics by anonymizing them with official statistics.
- Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that they do not violate national defense, national security, public security, public order, economic security, and privacy of private life or personal rights or constitute a crime.
- Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order or economic security.
- Processing of personal data by judicial authorities or execution authorities in relation to investigation, prosecution, trial or execution proceedings.

In accordance with the article 28/2 of KVKK, under the following conditions, personal data owners cannot assert their other rights, except the right to demand compensation:

- Processing of personal data is necessary for the prevention of crime or for criminal investigation.
- Processing of personal data publicized by the personal data owner.
- Processing of personal data is necessary for the execution of supervision or regulation duties and disciplinary investigation or prosecution by the commissioned and authorized public institutions and organizations and professional organizations having the status of public institutions, based on the authority granted by the law.
- Processing of personal data is necessary for the protection of the economic and financial interests of the State regarding budget, tax and financial issues.

OTHER MATTERS

As explained in detail above, your personal data can be stored and preserved, classified in accordance with market research, financial and operational processes and marketing activities, updated in different periods and, to the extent permitted by the legislation, within the framework of laws and confidentiality principles, third parties and/or suppliers and/or services required by the service Providers and/or foreign shareholders to whom we are affiliated, in accordance with

the policies to which we are affiliated and for reasons stipulated by other authorities, information can be transferred, stored, processed by reporting, and can be prepared in electronic or paper form as a basis for processing

In case of inconsistency between the provisions of the KVKK and other relevant legislation and this Policy, the provisions of the KVKK and other relevant legislation will be applied first.

This Policy prepared by our company has entered into force pursuant to the decision taken by the Aksa Akrylic Board of Directors.

We would like to remind you that we may update this notification due to the legislative provisions that may change in time and the changes that may occur in our company policies.

We will post the most current version of the Notice on our website.

The User(s) irrevocably agree, declare and undertake that they have read this Personal Data Protection Policy before entering the website, that they shall comply with all the matters stated herein, that the contents on the website and all electronic media and computer records belonging to our Company shall be considered as final evidence pursuant to Art. 193 of the Civil Procedures Law.

Data Supervisor:

Aksa Acrylic Chemical Industry Inc.
Merkez Mahallesi Yalova-Kocaeli Yolu
Caddesi No: 34 Taşköprü, 77040 Çiftlikköy /
Yalova Tel: +90 (226) 353 2545
Fax: +90 (226) 814 1855
Yalova Trade Registry Office /
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ANNEX - ABBREVIATIONS

ABBREVIATIONS	
Law no. 5651	Law on Regulation of Publications on the Internet and Fighting With Offenses Committed on the Internet Medium as effected in the Official Gazette no. 26350 on the 23 rd of May 2007
The Constitution	The Constitution of the Republic of Turkey no. 2709 issued on the 7 th of November as published in the Official Gazette no. 17863 on the 9 th of November 1982
Application Communiqué	Communiqué on Application Procedures and Principles for Data Subject effected upon publishing in the Official Gazette no. 30356 on the 10 th March 2018
Related Person(s) or Data Subject	Means individuals whose personal data are processed such as other individuals, including but not limited to customers of Aksa Akrilik and/or customers of group companies with which Aksa Akrilik has relations, corporate customers with which it has commercial relations, business partners, shareholders, authorities, employee candidates, interns, visitors, suppliers, employees of entities with which it is in cooperation, third parties and other individuals.
Regulation on Deletion, Destruction or Anonymizing Personal Data	Regulation on Deletion, Destruction or Anonymizing Personal Data effected on the 1 st of January, as published in the Official Gazette no. 30224 on the 28 th of October 2017
KVKK	Personal Data Protection Law effected after publishing on the Official Gazette no. 29677 on the 7 th of April 2016
KVK Board	Personal Data Protection Board
KVK Agency	Personal Data Protection Law
m.	Article
e.g. (Ex.)	Example
Policy	This Aksa Akrilik Personal Data Protection and Confidentiality Policy
Company/Aksa Akrilik	Aksa Akrilik Kimya Sanayii A.Ş
Turkish Criminal Law	Turkish Criminal Law no. 5237 issued on 26 th of September and Published in the Official Gazette no. 25611 on the 12 th of October 2004