

# PERSONAL DATA PROTECTION POLICY

## 1. PURPOSE AND SCOPE OF THE POLICY

The procedures and principles adopted and to be implemented by KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ for the purpose of ensuring compliance with the Personal Data Protection Law No. 6698 (“KVKK”), published in the Official Gazette dated 07.04.2016 and numbered 29677, and the relevant legal regulations, are regulated by this Policy within the scope of the data controller’s obligation to inform.

With respect to the personal data processed within KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ; the principles of processing personal data, the purposes and conditions of personal data processing, the transfer of personal data domestically and abroad, the destruction of personal data, and the practices and principles regarding the rights of data subjects over their processed personal data are set forth below.

KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ shall act in compliance with the procedures and processes determined in this Policy in matters such as ensuring compliance with the KVKK and other relevant regulations, and processing, using, destroying and transferring personal data in accordance with the Law and other relevant regulations.

## 2. DEFINITIONS

Explicit Consent	Consent that is related to a specific subject, based on being informed, and expressed with free will.
Anonymization	Rendering personal data incapable of being associated with an identified or identifiable natural person under any circumstances, even by matching with other data.
Recipient Group	The category of natural or legal persons to whom personal data are transferred by the data controller.
Direct Identifiers	Identifiers that directly reveal, disclose and distinguish the person with whom they are associated.
Indirect Identifiers	Identifiers which, when combined with other identifiers, reveal, disclose and distinguish the person with whom they are associated.
Relevant User	Except for the person or unit responsible for the technical storage, protection and backup of data, individuals who process personal data within the organization of the data controller or in accordance with the authority and instructions received from the data controller.

Destruction	Deletion, destruction or anonymization of personal data.
Redaction	Processes such as crossing out, painting over or blurring all of the personal data in a manner that prevents association with an identified or identifiable natural person.
Data Recording Environment	Any environment in which personal data are processed, whether wholly or partially by automatic means, or by non-automatic means provided that they form part of any data recording system.
Personal Data	Any information relating to an identified or identifiable natural person.
Processing of Personal Data	Any operation performed on personal data, whether wholly or partially by automatic means or by non-automatic means provided that they form part of any data recording system, such as obtaining, recording, storing, preserving, altering, reorganizing, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data.
Data Subject Board	The natural person whose personal data are processed. The Personal Data Protection Board.
Masking	Processes such as deleting, crossing out, painting over or anonymizing certain parts of personal data in a manner that prevents association with an identified or identifiable natural person.
Special Categories of Personal Data	Personal data relating to individuals' race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership in associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data.
Periodic Destruction	The deletion, destruction or anonymization of personal data carried out ex officio at recurring intervals specified in the personal data retention and destruction policy in cases where all of the conditions for processing personal data set forth in the Law cease to exist.
Registry	The registry of data controllers maintained by the Presidency of the Personal Data Protection Authority.
Deletion	The process of rendering personal data inaccessible and unusable for relevant users in any way.
Destruction (Elimination)	The process of rendering personal data inaccessible, irretrievable and unusable by anyone.
Data Processor	The natural or legal person who processes personal data on behalf of the data controller based on the authority granted by the data controller.

Data Controller

KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ; the natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.

### 3. PRINCIPLES OF PROCESSING PERSONAL DATA

Our Company carries out personal data processing activities within the framework of the principles and rules set forth below in accordance with Article 4 of the KVKK, which regulates the procedures and principles regarding the processing of personal data.

#### 1. Compliance with Law and Good Faith

KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ processes personal data in compliance with the KVKK and other laws and regulations that are mandatory due to the nature of the work performed.

#### 2. Accuracy and Being Up-to-Date

KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ ensures that personal data provided by the data subject are not altered without authorization or in a manner contrary to the truth. In the event of any change regarding the processed data and upon request of the data subject, the necessary procedures for updating personal data are carried out and the required technical and administrative measures are taken.

#### 3. Processing for Specific, Explicit and Legitimate Purposes

Personal data processed by KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ are processed in accordance with the declared purpose of processing and limited to the stated purpose.

#### 4. Being Relevant, Limited and Proportionate to the Purpose of Processing

Personal data that do not correspond to the legal consultancy and advocacy activities carried out by KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ, that are not required within the scope of such activities, and that exceed the purpose of processing are not processed.

#### 5. Retention for the Period Stipulated in the Relevant Legislation or Required for the Purpose for Which They Are Processed

Personal data processed within the scope of the KVKK and other relevant laws and regulations are retained for the periods stipulated in the relevant legislation or for the period required due to the nature of the personal data processed.

#### 4. CONDITIONS FOR PROCESSING PERSONAL DATA AND EXCEPTIONAL CASES

Pursuant to Article 5 of the KVKK, general categories of personal data to be processed within the scope of the activities of KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ may be processed;

- a) Provided that the explicit consent of the data subject is obtained; or,
- b) If it is explicitly stipulated by laws;
- c) If it is mandatory for the protection of the life or physical integrity of the person who is unable to express consent due to actual impossibility or whose consent is not legally valid, or of another person;
- d) Provided that it is directly related to the establishment or performance of a contract, and the processing of personal data belonging to the parties to the contract is necessary for the performance of the contract;
- e) If it is mandatory for the data controller to fulfill its legal obligation;
- f) If the data have been made public by the data subject;
- g) If data processing is mandatory for the establishment, exercise or protection of a right;
- h) If data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. In the presence of any of the above conditions, personal data may be processed without obtaining the explicit consent of the data subject.

Pursuant to Article 6 of the KVKK, special categories of personal data to be processed within the scope of the activities of KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ:

- a) Shall not be processed without obtaining the explicit consent of the data subject;
- b) Except for special categories of personal data relating to health and sexual life, may be processed without obtaining explicit consent in cases stipulated by law;
- c) Special categories of personal data relating to health and sexual life may be processed without obtaining the explicit consent of the data subject for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and planning and management of health services and their financing.

## 5. CLASSIFICATION OF PERSONAL DATA

Identity Information	Information written on the identity card, including name, surname, mother's name, father's name, place of birth, date of birth, marital status, religion, blood type, and the province, district and neighborhood of registration, as well as all other information written on the identity card without limitation.
Contact Information	Communication data requested from or provided by the relevant person in order to establish contact, such as home phone number, mobile phone number, residence address or other address information, and e-mail address. Copy of identity card, population registry record, residence certificate, health report, copy of diploma,
Personnel Information	biometric photograph, document indicating family status, military status document,, Employment Agreement / Service Agreement, Social Security employment entry document , criminal record (record of conviction), information and documents relating to health status.

Bank Account Information	Bank account number, IBAN number, and other information relating to credit cards and bank cards. Information stated in the CV or requested by us or provided by the relevant person, including education information, educational history, certificate information, information regarding educational background and training;,
Curriculum Vitae Information	Information relating to experience, duration and details of previous positions held, work experience;, Photographs included in the CV or requested by us or provided by the relevant person, References provided by the relevant person and information relating to such references..

## 6. PURPOSES AND METHODS OF PROCESSING PERSONAL DATA

Personal data are processed solely for the purposes of carrying out the activities of KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ and fulfilling obligations arising from legislation, and limited to these purposes. Accordingly:

### 1. Muhataba Ait Kişisel Veriler Bakımından

For the proper fulfillment of accounting, audit, notary, sworn translation and other related transactions arising during the execution of company activities within the scope of legal and contractual obligations,

In the event of a request for legal consultancy services related to the subject matter of our activities, for the evaluation of such request and the initiation of the relevant process,

For the creation and sending of e-mails regarding articles, information notes, announcements, legal bulletins, books and journals prepared within our organization, and for the provision of legal information through such communications,

For providing information about conferences and training activities,

For maintaining records relating to real and/or legal persons to whom services are provided within the scope of our fields of activity and for carrying out procedures and transactions related to the services rendered, personal data of counterparties may be processed.

## 2. With Respect to Personal Data of Business and Solution Partners

For ensuring workplace security, commercial security and economic security,

For establishing the necessary agreements within the scope of the business process and maintaining communication,

For fulfilling legal and contractual obligations, personal data of our business and solution partners may be processed.

## 3. With Respect to Personal Data of Job Applicants

For initiating, conducting and finalizing recruitment processes within KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ, recording such processes, and monitoring and improving recruitment procedures,

For forwarding job applications and CVs to the relevant department in order to assess suitability for the position and proceed to the interview process,

For determining, at the time of application and throughout the recruitment process, whether the job applicant meets the necessary and required qualifications for the position applied for,

For contacting references and obtaining reference information regarding the job applicant,

For contacting the job applicant following the evaluation carried out at the end of the recruitment process,

For informing the job applicant about employment opportunities when a suitable position becomes available in the future, following further evaluations,

For ensuring internal order and security through monitoring and recording via camera systems, CV information, identity information, contact information and other personal data of job applicants may be processed in line with these purposes and methods.

#### 4. With Respect to Personal Data of Employees

For conducting recruitment processes and fulfilling legal notifications,

For ensuring internal order and security through monitoring and recording by camera systems,

For performing obligations and liabilities required under applicable legislation and employment contracts,

For providing additional safeguards and benefits such as private health insurance,

For ensuring the security of business processes and legal activities carried out,

For providing information regarding employees' professional experience and qualifications on the website, office magazine, legal bulletin and similar platforms,

For taking photographs and recording videos during conferences, training activities and other events organized by KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ,

For making notifications to public institutions and organizations and all authorized public legal entities in accordance with applicable legislation, resolving disputes and providing necessary documentation during audits, your identity information, personnel information, bank account information, contact information and other personal data may be processed in line with these purposes and methods.

#### 7. ENSURING THE SECURITY OF PERSONAL DATA

As KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ, we implement the necessary technical and administrative measures within the required technological infrastructure to ensure that the personal data processed within the scope of our company activities are stored and protected in compliance with the KVKK and relevant legislation. In this context, we take precautions against data breaches, unauthorized access, data loss, unauthorized alteration of data and other threats, and carry out the necessary audits accordingly.

Within this scope, we identify existing risks and threats, conduct awareness activities by training our employees, and establish policies and procedures regarding personal data security.

### Technical Measures Taken to Ensure Lawful Storage of Personal Data and to Prevent Unlawful Processing and Access :

- Personal data storage, processing and access activities are monitored through established technical systems.
- Software and hardware including antivirus systems and firewalls are used.
- The technical measures taken are reported to the relevant parties.
- Access authorizations are restricted and regularly reviewed.
- Backup programs are used in compliance with the law to ensure the secure storage of personal data.
- Access to data storage areas containing personal data is logged.

### Administrative Measures Taken to Ensure Lawful Storage of Personal Data and to Prevent Unlawful Processing and Access:

- Employees are informed and trained on personal data protection law and on the lawful storage and processing of personal data.
- Personnel authorized to process, store and access personal data are determined within the personal data processing inventory.
- All activities carried out are analyzed in detail on a department-by-department basis, and as a result of this analysis, personal data processing activities specific to the commercial activities conducted by the relevant business units are identified.
- In order to ensure compliance with legal requirements determined on a departmental basis, awareness is raised within the relevant departments and implementation rules are established; necessary administrative measures are implemented through internal company procedures and trainings to ensure supervision and continuity of compliance.
- Employees are informed that they may not disclose personal data processed within the scope of their activities to third parties in violation of the provisions of the KVKK, nor use such data outside the purpose of processing, and that this obligation continues after termination of employment; necessary undertakings are obtained from them accordingly.
- Provisions are included in the contracts and documents governing the legal relationship between employees, imposing obligations not to process, disclose or use personal data except in accordance with the instructions of KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ and the exceptions provided by law, and awareness is created among employees in this regard.

In addition to these measures, in line with the data security principles stipulated under the KVKK, we ensure personal data minimization, establish the necessary confidentiality agreements with data processors, provide our employees with the required trainings to ensure the security of personal data and prevent violations, and take the necessary measures to secure personal data stored both electronically and in physical environments.

## 8. TRANSFER OF PERSONAL DATA DOMESTICALLY AND ABROAD

Personal data processed within KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ;

May, from time to time, be transferred to third parties for the purposes of improving the efficiency of our Company and developing our business and recruitment policies, and ensuring sustainability,

May be transferred, for the administration, management and execution of the activities within our Company, the implementation of company policies, and the efficient management and execution of business processes, to third parties and backup systems with whom we cooperate for data storage purposes,

Within the scope of the Company's activities, may be transferred to notaries and other institutions, sworn translation offices and other business partners, insurance companies and banks, third parties from whom services are obtained within the framework of company activities, and abroad in accordance with Article 9 of the KVKK.

And may be shared, upon request or where required pursuant to our legal obligations, with enforcement offices or courts at all levels and instances, as well as with relevant Ministries, directorates, the Social Security Institution and other related persons or entities.

## 9. DESTRUCTION OF PERSONAL DATA

This Policy has been established in order to set forth the procedure regarding what will happen to the personal data of data subjects whose personal data are processed upon obtaining their explicit consent, upon the elimination of the purposes for which such data were collected and processed or upon their request, and to determine under which procedures and principles such data will be deleted, destroyed or anonymized. The processes carried out shall be performed in accordance with the procedures and principles set forth in the "Regulation on the Deletion, Destruction or Anonymization of Personal Data."

All actions taken regarding the deletion, destruction or anonymization of personal data are recorded, and such records are retained for at least three (3) years, except for other legal obligations.

Personal data are retained by us within the scope and purposes specified in this Policy and in the manner stated herein, and are destroyed upon the termination of the relevant processes, the elimination of the conditions requiring their retention, the request of the data subject, or a decision of the Board.

#### 1. Technical and Administrative Measures Taken to Ensure Lawful Destruction of Personal Data

- **Secure Deletion via Software:** When deleting data processed wholly or partially by automated means and stored in digital environments, methods are used to ensure that the data are rendered completely inaccessible and irrecoverable for Relevant Users.
- **Deletion by Issuing Deletion Commands in Cloud Systems:** This may include removing the access rights of the relevant user to the file or directory located on the central server; deleting the relevant rows in databases using database commands; or deleting data stored on portable media such as flash drives through appropriate software.

However, if the deletion of personal data would result in the inability to access and use other data within the system, personal data shall be deemed deleted if they are archived in a manner that prevents association with the relevant person, provided that the following conditions are met:

- They are inaccessible to any other institution, organization or person;
- All necessary technical and administrative measures are taken to ensure that personal data are accessible only to authorized persons.
- **Secure Deletion by an Expert:** In certain cases, KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ may engage an expert to delete personal data on its behalf. In such cases, personal data shall be securely deleted by the expert in a manner that renders them completely inaccessible and irrecoverable for Relevant Users.
- **Redaction of Personal Data in Paper Format:** In order to prevent use of personal data beyond the intended purpose or to delete data upon request, the relevant personal data may be physically cut out from the document or rendered unreadable and irrecoverable by using permanent ink so that they cannot be restored or read through technological means.

- **Demagnetization:** The method of passing magnetic media through special devices that expose them to high magnetic fields in order to irreversibly corrupt the data stored thereon.
- **Physical Destruction:** Personal data may also be processed by non-automated means provided that they form part of a data recording system. In such cases, the system of physically destroying personal data in a manner that prevents subsequent use is applied. Paper and electronic data are destroyed in this manner where no other destruction method is feasible.
- **Overwriting:** The overwriting method involves writing random data consisting of 0s and 1s at least seven times onto magnetic and rewritable optical media through special software.
- **Anonymization Methods Not Providing Value Distortion:** Without making any changes, additions or deletions to the stored personal data, anonymization is achieved by generalizing a personal data group, swapping data within groups, or removing specific data or sub-data groups from a dataset.
- **Variable Removal:** By removing “highly descriptive” variables from a dataset created after combining collected data, the existing dataset is rendered anonymous.
- **Record Removal:** Data rows containing unique identifiers are removed from the dataset, thereby anonymizing the remaining data.
- **Regional Masking:** Where a single data point creates a highly distinctive combination, anonymization is achieved by masking the relevant data.
- **Bottom and Top Coding:** Through bottom and top coding, values within a predefined data category are combined based on a specific criterion, thereby anonymizing the dataset.
- **Generalization:** Through data aggregation, multiple data points are combined so that personal data can no longer be associated with any individual.
- **Global Coding:** By deriving more general content from the personal data, the data are transformed into a format that cannot be associated with any individual.
- **Anonymization Methods Providing Value Distortion:** Unlike methods not providing value distortion, these methods involve altering certain data within personal data groups to create distortion and achieve anonymization.
- **Noise Addition:** Particularly in datasets predominantly composed of numerical data, anonymization is achieved by adding certain positive or negative deviations to existing data at a predetermined rate.
- **Microaggregation:** In the microaggregation method, data are first sorted in a meaningful order and divided into groups; the average of each group is calculated, and the resulting value replaces the corresponding data in that group to achieve anonymization.
- **Data Swapping:** In the data swapping method, the values of a variable are exchanged between selected pairs within the stored dataset.

During the implementation of the above processes, full compliance with the KVKK, the Regulation and other relevant legislation is ensured for the purpose of data security, and all necessary administrative and technical measures are taken.

## 2. Periodic Destruction Period of Personal Data

Personal data held within KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ shall be reviewed at periodic intervals of six (6) months, and those for which all processing conditions have completely ceased shall be deleted, destroyed or anonymized.

In the first periodic destruction process following the date on which the obligation to delete, destroy or anonymize personal data arises, the personal data shall be deleted, destroyed or anonymized.

## 10. RIGHTS OF THE DATA SUBJECT

With respect to personal data processed within the scope of the activities of KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ, the data subject may submit a request within the framework of the rights set forth in Article 11 of the KVKK and has the right to:

- a) Learn whether his/her personal data are processed,
- b) Request information regarding the processing if his/her personal data have been processed,
- c) Learn the purpose of processing of personal data and whether they are used in accordance with their purpose,
- ç) Know the third parties to whom personal data are transferred domestically or abroad,
- d) Request correction of personal data if they are incomplete or inaccurately processed,
- e) Request the deletion or destruction of personal data within the framework of the conditions stipulated under Article 7 of the KVKK,
- f) Request notification of the transactions carried out pursuant to subparagraphs (d) and (e) to third parties to whom personal data have been transferred,

g) Object to the occurrence of a result against the person through analysis of processed data exclusively by automated systems,

ğ) Request compensation for damages in case of suffering damage due to unlawful processing of personal data.

## 11. FINAL PROVISIONS

In the event that data subjects exercise the rights set forth above and submit an application to KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ regarding the matters specified above, the requests contained in the application shall be finalized as soon as possible and at the latest within thirty (30) business days, depending on the nature of the request. The outcome of the request, whether accepted or rejected with reasons explained, shall be notified to the applicant within this period.

Unless otherwise decided by the Board, the appropriate method of deletion, destruction or anonymization of personal data ex officio shall be selected by KYASS TEKSTİL SANAYİ VE DIŞ TİCARET ANONİM ŞİRKETİ, with justification provided.

With respect to matters relating to the processing of personal data, data subjects may submit their applications by filling out the form available on the website and using one of the methods specified in the form that is suitable for them.

### Contact Information

Contact E-mail Address: [info@kyass.com.tr](mailto:info@kyass.com.tr) / [kyass@hs06.kep.tr](mailto:kyass@hs06.kep.tr)

Address: İsmet Paşa OSB Mah. 2 Sok. No: 4A Kapaklı/ TEKİRDAĞ

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