

“KORUMA KLOR ALKALİ SANAYİ VE TİCARET ANONİM ŞİRKETİ”
CLARIFICATION TEXT ON PROCESSING PERSONAL DATA

1. What is personal data, who process personal data?

Personal data means any information, which relates to an identified or identifiable natural person, as per the article 3 of the Law on Personal Data Protection No. 6698. **Koruma Klor Alkali Sanayi ve Ticaret Anonim Şirketi** (“Company”) shall record, keep, update, process and transfer to third parties your personal data in the capacity of **“data controller”** in compliance with the Law on Personal Data Protection No. 6698.

2. What are the purposes of processing personal data?

The following personal data;

Identity Information Data;

- *It is clearly provided for by the laws (Art. 5/2.a)*
- *It is mandatory for the controller to be able to perform his legal obligations (Art. 5/2.ç)*
- *Processing of personal data belonging to the parties of contract is necessary provided that it is directly related to the conclusion or execution of the contract (Art. 5/2.c)*

Contact Information Data;

- *Processing of personal data belonging to the parties of contract is necessary provided that it is directly related to the conclusion or execution of the contract (Art. 5/2.c)*
- *It is clearly provided for by the laws (Art. 5/2.a)*
- *It is mandatory for the controller to be able to perform his legal obligations (Art. 5/2.ç)*

Financial Information Data;

- *Processing of personal data belonging to the parties of contract is necessary provided that it is directly related to the conclusion or execution of the contract (Art. 5/2.c)*
- *It is clearly provided for by the laws (Art. 5/2.a)*

- *It is mandatory for the controller to be able to perform his legal obligations (Art. 5/2.ç)*

Physical Environment Security Information Data;

- *Processing of personal data belonging to the parties of contract is necessary provided that it is directly related to the conclusion or execution of the contract (Art. 5/2.c)*
- *It is clearly provided for by the laws (Art. 5/2.a)*
- *It is mandatory for the controller to be able to perform his legal obligations (Art. 5/2.ç)*
- *Data processing is mandatory for the establishment, exercise or protection of any right (Art. 5/2.e)*
- *It is mandatory for the legitimate interests of the controller provided that this processing shall not violate the fundamental rights and freedoms of the data subject. (Art. 5/2.f)*

Legal Action Data;

- *It is mandatory for the controller to be able to perform his legal obligations (Art. 5/2.ç)*

Special Quality Personal Data;

- *Explicit consent of the data subject (Art. 5/1)*

which are collected;

- Electronically in automatic or non-automatic ways through our website www.....com and other websites to be opened in the future,
- Electronically in automatic or non-automatic ways through “Cookies” providing communication with your devices at the website (anonymous data is generally collected through cookies)
- Electronically in automatic or non-automatic ways through the Company’s accounts (“Social Media”) on various social media channels
- Verbally or electronically in automatic or non-automatic ways through our call centers (“Call Center”) operated by the Company

- Electronically in automatic or non-automatic ways through e-mail via sales and marketing network established and managed by the Company,
- Electronically, in writing and verbally in automatic or non-automatic ways through contracts, e-mails and user devices,
- In writing by taking business cards of visitors of the Company verbally or by hand,
- Electronically, in writing and verbally in automatic or non-automatic ways within the scope of sales and marketing through our employees engaging in an activity on behalf of the Company and working at sales and marketing network,
- Electronically in automatic or non-automatic ways through website, electronic mail, mobile communication channels, mobile applications based on different legal reasons by our Company or data processing real person or legal entities on behalf of our Company,
- Physically at panel environment through advertisement management channel,
- Through any means of communication with miscellaneous communication methods including e-mail correspondences over your e-mail address, short messages sent for the activities of the Company or multimedia messages,
- Verbally, in writing or electronically in automatic or non-automatic ways within the scope of sales, marketing and after sale services through all services sales and marketing of the Company or established and operated by third parties,
- Verbally, in writing or electronically in automatic or non-automatic ways through our after sales services network by our Company or established or operated by third parties,
- Through third parties such as group companies to/from which the company provides/receives service, business partners, manufacturing companies or companies providing goods/services, online sales platforms, dealers, solution partner institutions and organizations,
- Verbally or electronically in automatic or non-automatic ways via social media or other channels where you make your Personal Data available to public

- Electronically through by keeping log entries over the system from devices used by the visitors using Wi-Fi
- Electronically through IP Camera system from the visitors at the Company or dealers on security reasons.

might be processed in compliance with the following reasons and purposes within the scope of the conditions of processing personal data through the abovementioned channels or other channels which may be added in the future.

The Company processes your Personal Data collected through the methods set forth herein and from the channels stated in this Clarification Text, in accordance with the following purposes:

- As per article 5.2 and 6.3 of the Law on Personal Data Protection;

As a rule, we process personal data upon your explicit consent. However; we might process your Personal Data without your explicit consent in case of exceptional circumstances permitted by the Law on Personal Data Protection. Within this scope, we process your personal data (i) for the sake of fulfilling our legal obligations (tax regulation, regulation for the protection of consumers, code of obligations, commercial code and obligations arising out of other regulations), (ii) in case where you are not able to express your consent due to actual impossibility (iii) establishment or execution of a contract (transactions of any kind, which can be attributed as per membership contracts, sale and purchase contracts, sale of goods or services, supplying and delivery of goods or services), (iv) in an attempt to fulfill our legal obligations such as to receive question and complaints in relation to service, to give response to you, to make delivery and to use them in case of any possible dispute, (v) in an attempt to establish or protect a right through transactions of any kind which can be attributed within the scope of the works and relevant amendments in relation to keeping the records as evidence under sale and post-sale services, (vi) in an attempt to protect your legitimate interest such as decreasing costs, using the resources productively, observing the service quality of call center, providing your security and measuring the quality of service provided to you, evaluating your requests in this respect and resolving them without damaging your fundamental rights and

freedoms. Furthermore, your personal that you have made available to public is not required your explicit consent for processing within the limits set forth in the Law on Personal Data Protection. Processing your personal data, which are made available to public through social media channels, your webpage and other mediums, and other transactions that can be attributed within the scope of the relevant amendment, can exemplify this situation. Apart from this, in cases requiring your explicit consent, your explicit consent will also be sought.

- The Company may process your Personal Data collected through the abovementioned methods and from the abovementioned channels stated in accordance with article 5.1 and 6.2 of the Law on Personal Data Protection for the below purposes on condition that your explicit consent is obtained:
 - (i)** Carrying out communication, advertisement and marketing, goods/services proposal, information of any kind, promotion and sales activities,
 - (ii)** Creating communication, advertisement targeting and marketing archive and contacting possible collaborations in the future,
 - (iii)** Conducting contract management,
 - (iv)** Providing better service to our users at our website and developing our services in an attempt to create attendants' information at fairs and events, area access permissions, event contracts,
 - (v)** Carrying out development works by our Company or our group for our customers' fields of interest and preferences,
 - (vi)** Providing legal and commercial safety of the Company, Affiliates and persons having or being in a business relation with the Company,
 - (vii)** Carrying out necessary works by our business units in order for you to benefit from the goods, services or commercial activities provided by the Company,
 - (viii)** Determining the commercial and business strategies of the company and purposes of implementation,
 - (ix)** Keeping the records of visitors in order to provide the security of the Company,

- (x) Presenting tailor-made advertisement , campaigns, advantages and other benefits, and carrying out other marketing and Customer Relations Management works,
- (xi) Maintaining the continuity of communication and marketing activities,
- (xii) Providing tailor-made content during your visit at the websites,
- (xiii) Providing advantages of tailor-made goods and services such as internet advertising, targeting, re-targeting, cross-selling, campaigns, opportunities and goods/services advertisements,
- (xiv) Creating free membership over the website,
- (xv) Creating new product and services models,
- (xvi) Sending electronic trade messages (bulletin, campaign, newsletters, customer satisfaction surveys, goods and services advertisements etc.)
- (xvii) Sending gifts, bulletin, promotion and other magazine/periodical publications,
- (xviii) Carrying out application to meetings, entrance and all other relevant transactions and completing briefings in relation to meetings, actions for the attendance to Congress/Symposium, scientific and educational meetings in order to organize corporate communication and other events and invitations and provide information in respect thereof,
- (xix) Processing your special quality personal data for establishment or execution of a contract, fulfilling our legal obligations, establishment, exercise or protection of a right, protection of legitimate interests without damaging your fundamental rights and freedoms where you are not able to express your consent due to actual impossibility.

3. To whom and for what purposes can the processed personal data be transferred?

Your collected personal data might be transferred to;

- a) Our business partners,
- b) Our suppliers,
- c) Company officials,

- d) Affiliates,
- e) Public organizations and natural persons authorized by the law as per article 8 and 9 of the Law on Personal Data Protection in order;
 - To carry out advertisement, communication and marketing activities from user devices during shopping,
 - For our company to fulfill its legal obligations,
 - For our business units to carry out necessary operational activities,
 - To provide legal and commercial security of our Company, its Affiliates, those having or being in a business relation with our Company and its Affiliates,
 - To get legal and commercial support for Affiliates,
 - To deliver products under the signed contracts,
 - To plan and execute human resources policies and processes of our Company and its Affiliates.

4. What are the legal reasons and the methods of processing personal data?

Your personal data is collected physically and electronically, in writing and verbally for the legal reasons prescribed in this Clarification Text and the article 2 of the Certificate of Consent by our Company during your access to the website and mobile application and creating free membership, while communicating with call center and customer relations, and during your visit to head office of the company, dealers and factories. Your collected personal data might be processed and transferred for the purposes set forth in this Clarification Text and the articles 2 and 3 of Certificate of Consent in compliance with the Law on Personal Data Protection.

5. Transfer of Your Personal Data to Third Parties and/or Abroad

Our company might process your personal data for the abovementioned purposes within the scope of your explicit consent by approving this Clarification Text and Certificate of Consent.

Such data might be shared by the Company with abroad or in the country as required by the legal regulation and/or the established contracts when necessary in order to carry out the necessary transactions and to provide you with various side benefits and interests. Furthermore, the relevant data might be processed and shared by our Company in order to keep the records prescribed by the laws and to execute audit activities.

The Company may transfer your personal data to our business partners, Affiliates, suppliers and third parties which are legally authorized and are found necessary to realize the aim in compliance with articles 8 and 9 of the Law on Personal Data Protection in order to carry our advertisement activities, to establish and amend sales contracts, to create proposals, to execute necessary transactions in respect thereof, to present and enhance goods and services, to carry out requests in relation to goods and services and to take necessary actions, to carry out executed activities in compliance with the relevant legislation and Company policies, to contact you in relation to our goods and services in case of explicit consent, to carry out goods/services proposal, information of any kind, advertisement-promotion, sales and marketing, to carry out marketing activities with our Company and affiliates of the Company, to conduct portfolio works and share proposals in relation to relevant goods and services, to carry out improvement works by our company and our group companies for our customers' fields of interest and preferences, to provide legal and commercial security of our Company, its Affiliates, those having or being in a business relation with our Company and its Affiliates, to carry out necessary works by our business units in order to make you benefit from goods, services or commercial activities provided by the Company, to provide better service through our website to our users and improve our services, and to determine and implement commercial and business strategies of the Company.

6. What is your processed personal data in relation to the communication?

For the reasons set forth in article 2 of this Clarification Text and Certificate of Consent, content of corporate e-mail addresses belonging to our Company, your contact details

saved through the website and IP details of the means of communication that you use while entering into the website might be tracked by the Company and/or authorized person(s) at any time, without further notice and warning; the correspondences and communication records made with the company officials, employees, call center and customer relations employees might be backed up, reported and reviewed in detail when necessary. Furthermore, in order to sustain advertisement, communication and marketing activities, location details of authorized members through the users' devices over the website or application might be collected.

7. For how long can your personal data be processed?

Personal Data that you have shared with the Company through the channels stated herein will be processed in compliance with the periods stipulated in the Law on Personal Data Protection, the regulation in relation to the personal data protection unless the abovementioned legitimate purposes disappear.

8. What are your rights pursuant to the Law on Personal Data Protection No. 6698?

Within the scope of the article 11 of the Law, you have a right to;

- Learn whether or not your personal data have been processed;
- Request information as to processing if your data have been processed;
- Learn the purpose of processing of your personal data and whether data are used in accordance with their purpose;
- Know the third parties in the country or abroad to whom personal data have been transferred;
- Request rectification in case personal data are processed incompletely or inaccurately and request notification of the rectification to third parties to whom personal data have been transferred;
- Request deletion or destruction of personal data and request notification of this action to third parties to whom personal data have been transferred within the framework of the conditions set forth under article 7, excluding legal boundaries;

- Object to occurrence of any result that is to your detriment by means of analysis of personal data exclusively through automated systems;
- Request compensation for the damages due to unlawful processing of your personal data.

9. How can you apply to data controller?

You may exercise your abovementioned rights by submitting to our Company in writing and with your original signature or through a registered electronic mail address, secure electronic address, mobile signature or by a relevant person by using the electronic mail address which has been notified and registered in our system.

As for written applications, the application address is “*Deniz Mahallesi, Klor Fab. Servis Yolu No:43, 41900 Derince/Kocaeli*”. In case a person makes a request on behalf of data subject, a special power of attorney relating to the matter granted by the data subject to the applicant should be issued.

Applications which are forwarded to our Company in due form shall be finalized within thirty days at the latest with no charge. In case a reply exceeds ten pages, 1 Turkish Lira may be charged as a transaction fee for each page exceeding ten pages. In case a reply is given through a CD or flash disk, the cost of data recording medium may be demanded.

“Clarification Text on Processing Personal Data and Certificate of Consent” including information on processing personal data by your Company has been shared with you for your review.