



**ÜNAL SENTETİK DOKUMA SAN. VE
TİC. A.Ş.
PERSONAL DATA PROTECTION
AND PROCESSING POLICY**

Document No.	ORT.KA.PO.006
Page	1 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

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PERSONAL DATA PROTECTION AND PROCESSING
POLICY**

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AND PROCESSING POLICY**

Document No.	ORT.KA.PO.006
Page	2 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

**ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş.
PERSONAL DATA PROTECTION AND PROCESSING INFORMATION FORM**

Document Name : ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş.
Personal Data Protection and Processing Policy

Scope : All natural persons whose personal data are processed by
ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş.

Prepared by : Legal Department

Date/Version : 22/07/2022

Approved by : Approved by the ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş.
PDP Board directors and legal department.



**ÜNAL SENTETİK DOKUMA SAN. VE
TİC. A.Ş.
PERSONAL DATA PROTECTION
AND PROCESSING POLICY**

Document No.	ORT.KA.PO.006
Page	3 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

TABLE OF CONTENTS

1.	PURPOSE	4
2.	SCOPE	4
2.1.	Implementation of the Policy and Legislation	4
2.2.	Effective Date of the Policy	4
3.	DEFINITIONS AND ABBREVIATIONS	4
4.	DUTIES AND RESPONSIBILITIES	5
5.	PRINCIPLES AND PROCEDURES FOR PERSONAL DATA PROTECTION	6
5.1.	General Principles of Personal Data Processing	6
5.2.	Conditions of Processing Personal Data	7
5.3.	Purposes of Processing Personal Data	8
5.4.	Storage and Destruction of Personal Data	8
5.5.	Transfer of Personal Data to Persons in the Country	9
5.6.	Transfer of Personal Data Abroad	10
5.7.	The Company's Obligation to Inform	10
6.	RIGHTS OF THE DATA SUBJECT	11
6.1.	Rights of the Data Subject	11
6.2.	Exercising the Rights of the Data Subject	11
6.3.	Our Company's Response to Applications	11
7.	MEASURES TAKEN FOR DATA SECURITY	11
7.1.	Ensuring the Security of Personal Data	12
7.2.	Protecting Sensitive Personal Data	12
8.	SPECIAL CIRCUMSTANCES WHERE PERSONAL DATA ARE PROCESSED	12
8.1.	Personal data processing activities carried out on the Building, Factory entrances and inside the premises and Website Visitors	12
8.2.	Security camera records obtained on the Building, Factory entrances and inside the premises	12
8.3.	Monitoring of Guest Entrances-Exits on the Building, Factory entrances and inside the premises	12
9.	PERSONAL DATA PROTECTION AND PROCESSING POLICY'S RELATIONSHIP WITH OTHER POLICIES	13
10.	MISCELLANEOUS	13
11.	UPDATES	13
12.	ENTRY INTO FORCE	13
13.	MAINTENANCE	13
14.	DISTRIBUTION	13
15.	ANNEXES	13
	Annex – 1 : Data Subject Application Form	14
	Annex – 2 : List of Groups of Persons with Whom the Personal Data are Shared	14
	Annex – 3 : Personal Data Categories	15
	Annex – 4 : Data Subjects	17



**ÜNAL SENTETİK DOKUMA SAN. VE
TİC. A.Ş.
PERSONAL DATA PROTECTION
AND PROCESSING POLICY**

Document No.	ORT.KA.PO.006
Page	4 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

1. PURPOSE

As ÜNAL SENTETİK DOKUMA SAN. VE TİC. A.Ş. (“**Company**”) Protection of Personal Data is among our top priorities and we strive to act in compliance with all the applicable legislation in this matter. Since the date on which the Personal Data Protection Law no. 6698 (“KVKK” or the “**Law**”) took effect, we have been placing great importance on protecting the personal data of all the natural persons with whom we come into contact in any way while conducting our commercial activities, and fulfilling all the requirements set forth by the KVKK without exception.

This Personal Data Protection and Processing Policy (“**Policy**”) was prepared to inform you regarding the processes and principles related to ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş.’s collection, use, disclosure and storage of personal data. This policy includes matters regarding the ÜNAL SENTETİK DOKUMA SAN. VE TİC. A.Ş.’s processing of the personal data owned by the data subjects according to the order set forth in the KVKK, and these explanations apply to ÜNAL SENTETİK DOKUMA SAN. VE TİC. A.Ş. employees, suppliers, business partners, active and potential customers, visitors and other natural persons who have a business relationship with ÜNAL SENTETİK DOKUMA SAN. VE TİC. A.Ş. Your personal data are processed and protected under this Policy with the full understanding of our responsibilities in this regard.

2. SCOPE

This policy involves all personal data owned by the natural persons with whom our Company comes into contact with in any way, which are processed through fully or partially automatic means or non-automated means provided that it is part of a data recording system. Detailed information regarding these data subjects can be found in ANNEX 2 (“*ANNEX 2 – Data Subjects*”) of this Policy.

2.1 Implementation of the Policy and Relevant Legislation

The relevant legal regulations in force regarding the processing and protection of personal data shall apply in particular. In case of an incompatibility between the legislation in force and the Policy, our Company accepts that the legislation in force shall apply. The Policy organizes and materializes the rules set forth by the relevant legislation within the scope of Company practices.

2.2 Effective Date of the Policy

The effective date of this Policy is 22/07/2022.

This Policy is published on the ÜNAL SENTETİK DOKUMA SAN. VE TİC. A.Ş. website <https://www.unalsentetik.com.tr/kvkk> and made available to the interested parties upon request of the data subjects.

3. DEFINITIONS AND ABBREVIATIONS

Abbreviation

Definition

- a- Data subject : Natural person whose personal data is processed
- b- Board : Personal Data Protection Board
- c- Law : Personal Data Protection Law no. 6698
- d- Personal Data : All types of identified or identifiable data
- e- Sensitive Personal Data : Data relating to the race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and attire, membership of



**ÜNAL SENTETİK DOKUMA SAN. VE
TİC. A.Ş.
PERSONAL DATA PROTECTION
AND PROCESSING POLICY**

Document No.	ORT.KA.PO.006
Page	5 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

- associations, foundations or trade unions, health, sexual life, criminal convictions and security measures of a person and biometric and genetic data
- f- Explicit Consent : Freely given consent based on a certain topic, based on being informed
- g- Processing of Personal Data: All kinds of operations performed on personal data such as obtaining, recording, storing, retaining, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automated means or by non-automated means provided that they are part of a data recording system
- h- Data Recording System : A recording system where personal data are structured and processed based on certain criteria
- i- Data Controller : A natural or legal person who determines the purposes and means through which the personal data are processed, who is responsible for establishing and managing a data recording system
- j- Data Controllers Registry : A public registry system, to which natural or legal persons who process personal data have to register before they start processing any data
- k- Data Processor : A natural or legal person who processes personal data on behalf of the data controller, based on the authorization given by the data controller
- l- Erasure of Personal Data : Personal data being rendered inaccessible and non-reusable for the relevant users
- m- Destruction of Personal Data : Personal data being rendered inaccessible, irretrievable and non-reusable for anyone
- n- Anonymization : Personal data being rendered non-associable with any identified or identifiable natural person in any way, even by matching with other data
- o- Recipient Group : A group of natural or legal persons to whom the personal data are transferred by the data controller
- p- Relevant User : With the exception of the person or department who are technically responsible for storing, protecting and obtaining backups of the data, persons who process the personal data as per the authorization and instructions given by the data controller or within the organization of the data controller
- q- Disposal : The erasure, destruction or anonymization of the personal data
- r- Periodic Disposal : In the event that all of the conditions for processing personal data as specified in the Law disappear, the erasure, destruction or anonymization process to be carried out ex officio at recurring intervals as specified in the personal data storage and destruction policy,
- s- Recording Media : Any kind of media that includes personal data which is processed through fully or partially automated means or non-automated means provided that it is a part of a data recording system
- t- Personal Data Processing Inventory : An inventory in which data controllers detail the personal data processing activities they carry out depending on their business processes by associating them with the purposes of processing personal data, data category, the recipient group to whom they are transferred and the data subject group and by explaining the maximum time required for the purposes for which personal data are processed, the personal data stipulated to be transferred to foreign countries and the measures taken regarding data security

4. DUTIES and RESPONSIBILITIES



**ÜNAL SENTETİK DOKUMA SAN. VE
TİC. A.Ş.
PERSONAL DATA PROTECTION
AND PROCESSING POLICY**

Document No.	ORT.KA.PO.006
Page	6 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

The Company has formed a new board of relevant users as it fulfills the obligations imposed on it pursuant to this policy and the Personal Data Protection Law no. 6698. This board fulfills its responsibilities regarding the KVKK based on the authorizations given by the company.

5. PRINCIPLES AND PROCEDURES FOR PERSONAL DATA PROTECTION

5.1 Principles of Data Protection

ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. (ÜNAL SENTETİK) processes personal data according to the principles and procedures set forth in the KVKK and other laws. In this regard, when processing personal data, ÜNAL SENTETİK ensures full compliance with the principles below as set forth in the KVKK.

a- Processing According to the Principle of Lawfulness and Fairness

ÜNAL SENTETİK acts in accordance with the principles introduced by legal regulations and the general rule of trust and honesty in the processing of personal data. Within this framework, personal data are processed to the extent required by and limited to the business activities of our Company.

b- Ensuring that Personal Data Are Accurate and Kept Up to Date Where Necessary

ÜNAL SENTETİK takes the necessary measures to ensure that personal data is accurate and up-to-date during the processing period and establishes the necessary mechanisms to ensure the accuracy and currency of personal data for certain periods of time.

c- Processing for Specified, Explicit and Legitimate Purposes

ÜNAL SENTETİK clearly sets out the purposes of processing personal data and processes it within the scope of purposes related to these activities in line with its business activities.

d- Being Relevant, Limited and Proportionate to the Purposes for Which They Are Processed

ÜNAL SENTETİK only collects the personal data to the extent required by the business activities and limited to the purposes determined.

e- Being Stored For The Period Laid Down By Relevant Legislation or the Period Required For the Purpose For Which the Personal Data are Processed

ÜNAL SENTETİK retains personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the legal legislation to which the relevant activity is subject. In this context, our Company first determines whether a period is stipulated for the storage of personal data in the relevant legislation, and if a period is determined, it acts in accordance with this period. If there is no legal period, personal data are stored for the period required for the purpose for which they are processed. At the end of the retention periods, the personal data are disposed according to the periodic disposal periods or according to the application of the data subject, using the determined means of disposal (erasure and/or destruction and/or anonymization).

5.2 Conditions of Processing Personal Data

5.2.1. KVKK regulates the conditions of processing personal data, and ÜNAL SENTETİK processes the personal data according to the following conditions. Aside from the exceptions listed in the Law, ÜNAL SENTETİK only processes the personal data by obtaining the **explicit consent** of the data subjects.

5.2.2. If the following circumstances apply as listed in the Law, personal data may be processed

without obtaining the explicit consent of the data subject.

a- *It is expressly provided for by the laws,*

If the personal data of the data subject is explicitly stipulated in the law, in other words, if there is a clear provision in the relevant law regarding the processing of personal data, it can be said that this data processing condition exists.

b- *If the data subject is unable to give consent due to physical disability,*

Data subject's personal data may be processed if it is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid.

c- *Provided that it is directly related to the establishment or performance of the contract,*

This condition applies if it is necessary to process personal data, provided that a contract to which the data subject is a party is executed and that the procedure is directly related to the establishment or performance of the contract.

d- *It is necessary for compliance with a legal obligation to which the data controller is subject,*

The data subject's personal data may be processed if processing is compulsory for our Company to fulfill its legal obligations.

e- *Personal data have been made public by the data subject himself/herself,*

If the data subject has made their personal data public, the relevant personal data may be processed in a limited scope of the purpose of making it public.

f- *Data processing is necessary for the establishment, exercise or protection of any right*

The data subject's personal data may be processed if data processing is necessary for the establishment, exercise or protection of any right.

g- *Processing of data is necessary for the legitimate interests pursued by the data controller*

The data subject's personal data may be processed if processing of data is necessary for the legitimate interests pursued by our Company, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

5.2.3. Processing of Sensitive Personal Data

Sensitive personal data are processed by our Company in accordance with the principles set forth in this Policy, taking all the administrative and technical measures including the methods to be determined by the Board, in case the following conditions exist:

a- *Sensitive personal data aside from health and sexual life,*

May be processed without seeking explicit consent of the data subject, in the cases provided for by laws, in other words, if there is a clear provision in the relevant law that governs the activity regarding the processing of personal data. Otherwise, the data subject's explicit consent shall be obtained to process such sensitive personal data.

b- *Sensitive personal data concerning health and sexual life,*

May only be processed, without seeking explicit consent of the data subject, by the persons subject to secrecy obligation or competent public institutions and organizations, for the



**ÜNAL SENTETİK DOKUMA SAN. VE
TİC. A.Ş.
PERSONAL DATA PROTECTION
AND PROCESSING POLICY**

Document No.	ORT.KA.PO.006
Page	8 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing. Otherwise, the data subject's explicit consent shall be obtained to process such sensitive personal data.

5.3 Purposes of Processing Personal Data

Personal data are processed by ÜNAL SENTETİK, by informing the relevant parties as per the 10th article of the Law and the secondary legislation, in accordance with our Company's purposes for processing personal data, based on at least one of the personal data processing conditions listed in article 5 and 6 of the Law and in a limited scope, in accordance with the principles listed in the 4th article of the Law on the processing of personal data in particular and the general principles set forth in the Law. Within the framework of the purposes and conditions specified in this Policy, you may find the categories of processed personal data and detailed information about the categories from the document ANNEX 3 ("ANNEX 3 – Personal Data Categories") of this Policy.

The purposes of processing the personal data shall include the following:

- HR operations,
- Internal operations,
- Activities with legal, technical and administrative consequences,
- Strategy, planning and business partner/supplier management,
- Processes of Product/Service purchase, sale and operations
- Planning and execution of corporate communication activities, events
- Planning and execution of company's internal training programs
- During the execution of commercial activities carried out with the customers and the suppliers,

The categories listed above are for informational purposes and we may include other categories for ÜNAL SENTETİK to conduct its commercial and operational activities in the future. In such cases, ÜNAL SENTETİK shall update the relevant policy and other documents and inform the relevant parties.

5.4 Storage and Destruction of Personal Data

ÜNAL SENTETİK stores the personal data it obtains for the period required for the purpose for which they are processed and in accordance with the minimum periods stipulated in the legal legislation to which the relevant activity is subject. In this context, our Company first determines whether a period is stipulated for the storage of personal data in the relevant legislation, and if a period is determined, it acts in accordance with this period. ÜNAL SENTETİK acts in accordance with the obligations stipulated in all relevant legislation, especially the KVKK, regarding the protection of personal data.

Pursuant to the relevant legislation, except for the cases where it is permitted or required to keep personal data for a longer period of time, in the event that the purposes of processing personal data are no longer relevant, the data will be erased, destroyed or anonymized by ÜNAL SENTETİK ex officio or through the enclosed data subject application form and upon the request of the relevant persons through different methods that can be used. In the event that personal data is erased by means of such methods, this data will be disposed in such a way that it cannot be used or retrieved in any way again.

In case where the data controller has legitimate interests, despite the fact that the purpose of processing and the periods specified in the relevant laws have expired, personal data may be retained in accordance with the general statute of limitations regulated in the Code of Obligations (ten years) and the Occupational Health and Safety



**ÜNAL SENTETİK DOKUMA SAN. VE
TİC. A.Ş.
PERSONAL DATA PROTECTION
AND PROCESSING POLICY**

Document No.	ORT.KA.PO.006
Page	9 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

Law No. 6331, Regulations on Occupational Health and Safety Services (fifteen years), provided that the fundamental rights and freedoms of the data subjects are not harmed. After the expiration of the aforementioned statute of limitations, personal data will be erased, destroyed or anonymized according to the aforementioned procedure.

5.5 Transfer of Personal Data to Persons In the Country

Our Company may transfer the personal data and sensitive personal data of the data subject to third parties (third party companies, public and private authorities, third natural persons) by taking the necessary safety measures in accordance with the purposes of processing personal data lawfully. In this regard, our Company acts in accordance with the regulations stipulated in article 8 of the Law.

Despite not obtaining the explicit consent of the data subject, in case one or more of the conditions listed below exist, personal data may be transferred to third parties by our Company by exercising due diligence and taking all the necessary safety measures including the methods stipulated by the Board.

- Activities related to the transfer of personal data are expressly provided for by the laws,
- Transfer of personal data by the Company is directly related to and necessary for the establishment or performance of a contract,
- Transfer of personal data is necessary for compliance with a legal obligation to which our Company is subject,
- Provided that the personal data have been made public by the data subject himself/herself, personal data being transferred by our Company in a limited scope for the purpose of making it public,
- Transfer of personal data by the Company is necessary for the establishment, exercise or protection of any right of the Company or of the data subject or of third parties,
- Transfer of personal data is necessary for the legitimate interests pursued by the Company, provided that this activity shall not violate the fundamental rights and freedoms of the data subject,
- It is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid.

Sensitive personal data are processed by our Company in accordance with the principles set forth in this Policy, **taking all the administrative and technical measures including the methods to be determined by the Board, in case the following conditions exist:**

Sensitive personal data aside from health and sexual life, may be processed without seeking explicit consent of the data subject, in the cases provided for by laws, in other words, if there is a clear provision in the relevant law that governs the activity regarding the processing of personal data. Otherwise, the data subject's explicit consent shall be obtained.

Sensitive personal data concerning health and sexual life may only be processed, for the purposes of,

- protection of public health,
- operation of preventive medicine,
- medical diagnosis,
- treatment and nursing services,
- planning and management of health-care services as well as their financing without seeking explicit consent of the data subject.



**ÜNAL SENTETİK DOKUMA SAN. VE
TİC. A.Ş.
PERSONAL DATA PROTECTION
AND PROCESSING POLICY**

Document No.	ORT.KA.PO.006
Page	10 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

The conditions stipulated for processing this data also apply to the transfer of sensitive personal data.

5.6 Transfer of Personal Data Abroad

In addition to the above, regarding the transfer of personal data abroad, the explicit consent of the data subject is sought in accordance with Article 9 of the LPPD. However, in the presence of any of the above conditions, personal data, including sensitive personal data, may be transferred to foreign countries declared by the Board to have adequate protection (“**Foreign Country with Adequate Protection**”) in the presence of any of the above conditions. In the absence of adequate protection, in accordance with the data transfer conditions stipulated in the legislation, personal data may be transferred to foreign countries where the data controllers in Turkey and the relevant foreign country guarantee adequate protection in writing and where the Board has permission (“**Foreign Country Where the Data Controller Guarantees Adequate Protection**”).

In addition to the above, personal data may be transferred to **Foreign Countries with Adequate Protection** in the presence of any of the above conditions. In the absence of adequate protection, personal data may be transferred to **Foreign Countries where the Data Controller Guarantees Adequate Protection** in accordance with the data transfer conditions stipulated in the legislation.

5.7 Obligation to Inform

As per article 10 of the KVKK, data subjects must be informed before their personal data are obtained or at the latest during the acquisition of their personal data. ÜNAL SENTETİK informs the data subjects before starting to process the data of the data subjects or at the latest when processing their personal data. The data controller is obligated to transmit the following information to the data subjects as per its obligation to inform:

- The identity of the data controller and of its representative, if any,
 - The purpose of processing of personal data,
 - To whom and for which purposes the processed personal data may be transferred,
 - The method and legal basis of collection of personal data,
- Other rights referred to in Article 11 of KVKK.

On the other hand, as per KVKK art. 28(1), ÜNAL SENTETİK does not have the obligation to inform in the following cases:

- Personal data processing is necessary for the prevention of committing a crime or for crime investigation,
- Is carried out on the data which are made public by the data subject himself/herself,
- Is necessary for performance of supervision or regulatory duties and disciplinary investigation and prosecution to be carried out by the assigned and authorized public institutions and organizations and by public professional organizations, in accordance with the power conferred on them by the law,
- Personal data processing is necessary for protecting the economic and financial interests of the State related to budget, tax and financial matters.

6. RIGHTS OF THE DATA SUBJECT AND METHODS OF APPLICATION

6.1 Rights of the Data Subject

Data subjects have the following rights:

- To learn whether his/her personal data are processed or not,
- To demand for information as to if his/her personal data have been processed,
- To learn the purpose of the processing of his/her personal data and whether these personal data are



**ÜNAL SENTETİK DOKUMA SAN. VE
TİC. A.Ş.
PERSONAL DATA PROTECTION
AND PROCESSING POLICY**

Document No.	ORT.KA.PO.006
Page	11 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

- used in compliance with the purpose,
- d- To know the third parties to whom his personal data are transferred in country or abroad,
 - e- To request the rectification of the incomplete or inaccurate data, if any,
 - f- To request the erasure or destruction of his/her personal data under the conditions referred to in Article 7,
 - g- To request reporting of the operations carried out pursuant to sub-paragraphs (e) and (f) to third parties to whom his/her personal data have been transferred,
 - h- To object to the occurrence of a result against the person himself/herself by analyzing the data processed solely through automated systems,
 - i- To claim compensation for the damage arising from the unlawful processing of his/her personal data.

6.2 Exercising the Rights of the Data Subject

Data subjects may submit their requests regarding the rights listed in section 6.1. (“*Rights of the Data Subject*”) to our Company through the methods determined by the Board. In this regard, they may use the “ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. Data Subject Application Form” which can be found on <https://www.unalsentetik.com.tr/kvkk>.

6.3 Our Company’s Response to Applications

Our Company takes the necessary administrative and technical measures to finalize the applications to be made by the data subjects according to the Law and secondary legislation.

If the data subject duly submits their request regarding the rights listed in section 6.1. (“*Rights of the Data Subject*”) to our Company, our Company shall finalize the request free of charge, as soon as possible, and within 30 (thirty) days at the latest depending on the nature of the request. However, if the procedure involves additional costs, fees may be charged according to the tariff determined by the Board.

7. MEASURES TAKEN FOR PERSONAL DATA SECURITY

In accordance with Article 12 of the Law, our Company takes the necessary measures according to the nature of the data to be protected in order to prevent unlawful disclosure, access, transfer or other security deficiencies that may occur otherwise. In this context, our Company takes administrative measures to ensure the necessary level of security in accordance with the guidelines published by the Personal Data Protection Board (“**Board**”), conducts audits or has them conducted. Our Company takes all necessary technical and administrative measures to ensure the appropriate level of security required for the protection of personal data. The measures stipulated in article 12(1) of the KVKK are as follows:

- Preventing unlawful processing of personal data,
- Preventing unlawful access to personal data,
- Ensuring protection of personal data.

7.1 Ensuring the Security of Personal Data

In accordance with Article 12 of the Law, our Company takes the necessary measures according to the nature of the data to be protected in order to prevent unlawful disclosure, access, transfer or other security deficiencies that may occur otherwise. In this context, our Company takes administrative measures to ensure the necessary level of security in accordance with the guidelines published by the Personal Data Protection Board (“**Board**”), conducts audits or has them conducted.

7.2 Protecting Sensitive Personal Data

The Law attaches special importance to certain personal data due to the risk of causing victimization or



**ÜNAL SENTETİK DOKUMA SAN. VE
TİC. A.Ş.
PERSONAL DATA PROTECTION
AND PROCESSING POLICY**

Document No.	ORT.KA.PO.006
Page	12 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

discrimination when processed unlawfully. These data include race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and attire, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data.

ÜNAL SENTETİK acts carefully in protecting sensitive personal data that are determined to be “sensitive” by the Law and processed according to the law. In this regard, the technical and administrative measures taken by ÜNAL SENTETİK for the protection of personal data are carefully implemented in terms of sensitive personal data and necessary audits are carried out within ÜNAL SENTETİK. In this context, a separate policy has been established on the protection and processing of sensitive personal data.

8. SPECIAL CIRCUMSTANCES WHERE PERSONAL DATA ARE PROCESSED

8.1 Personal data processing activities carried out on the Building, Factory entrances and inside the premises and Website Visitors

ÜNAL SENTETİK carries out personal data processing activities for the purpose of ensuring security, in ÜNAL SENTETİK buildings and facilities, for the purpose of monitoring the entrances and exists of guests with security cameras.

8.2 Security camera records obtained on the Building, Factory entrances and inside the premises

ÜNAL SENTETİK takes security camera footage for the purpose of ensuring security in buildings and facilities in accordance with the relevant legislation. ÜNAL SENTETİK carries out security camera monitoring activities for the purpose of ensuring security in buildings and facilities in accordance with the conditions of processing personal data as listed in the Law and for the purposes stipulated in the relevant legislation.

ÜNAL SENTETİK informs the data subjects regarding the camera monitoring activities with suitable methods as per article 10 of the Law.

The records saved and stored on digital media with live camera recordings are only made accessible to certain data controller employees. Additionally, the limited number of people who have access to these records declare that they shall protect the confidentiality of the data they access.

8.3 Monitoring of Guest Entrances-Exits on the Building, Factory entrances and inside the premises

ÜNAL SENTETİK carries out personal data processing activities for the purpose of ensuring security and the purposes specified in this Policy, in the company buildings and facilities, to monitor the entrances and exits of guests.

As we acquire the personal data of the people who visit the company’s buildings as a guest, we inform the data subjects through signs we posted or other texts made available to the guests.

9. PERSONAL DATA PROTECTION AND PROCESSING POLICY’S RELATIONSHIP WITH OTHER POLICIES

In regard to the protection and processing of personal data, which is governed by the provisions of this Policy, our Company also creates sub-policies for internal use and policies for protecting sensitive personal data and for the storage and disposal of personal data.

10. MISCELLANEOUS



**ÜNAL SENTETİK DOKUMA SAN. VE
TİC. A.Ş.
PERSONAL DATA PROTECTION
AND PROCESSING POLICY**

Document No.	ORT.KA.PO.006
Page	13 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

In case of a discrepancy between the KVKK and the other relevant legislation and this Policy, the KVKK and the other relevant legislation shall prevail.

In case of a change in the Policy, the Policy's effective date and the relevant clauses shall be updated accordingly. The update table can be found in the "Document ID" section.

11. UPDATES

This Policy is reviewed and updated once a year by the relevant Legal Department.

12. ENTRY INTO FORCE

This Policy, which was prepared by the Company entered into force on the date **22/07/2022**.

13. MAINTENANCE

The responsibility of maintaining this document belongs to the Legal Department.

14. DISTRIBUTION

This Policy is published on the company's website, the Company's intranet and announced to third parties and Company employees.

15. ANNEXES

ANNEX – 1 : Data Subject Application Form

ANNEX – 2 : List of Groups of Persons with Whom the Personal Data are Shared

ANNEX – 3 : Personal Data Categories

ANNEX – 4 : Data Subjects

[CLICK HERE FOR ANNEX - 1 : DATA SUBJECT APPLICATION FORM](#)

ANNEX – 2 : List of Groups of Persons with Whom the Personal Data are Shared

- Banks and Financial Institutions
- Suppliers
- Insurance and Brokerage Services
- Financial Advisors, Accountants
- Courier Companies
- Company Officials
- Company's Legal Department
- Customs advisors
- Legally Authorized Public Agencies and Institutions



**ÜNAL SENTETİK DOKUMA SAN. VE
TİC. A.Ş.
PERSONAL DATA PROTECTION
AND PROCESSING POLICY**

Document No.	ORT.KA.PO.006
Page	14 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

ANNEX – 3 : Personal Data Categories

IDENTIFICATION	Name-Surname, TR ID No., Identity Card Serial / Sequence Number, Passport Number, Place of Birth, Date of Birth, Age, Father's Name, Mother's Name, Mother's Maiden Name, Marital Status, Place of Registration, Photograph, Nationality/Citizenship Information, Gender, Signature,
CONTACT	Address, E-mail address, Contact Address, Registered Electronic Mail (KEP) Address, Telephone No,
TRANSACTION SECURITY	IP address information, Internet site login and exit information, Mac ID Information, Mail Traffic Monitoring Information, Password information / Authentication Information
CUSTOMER TRANSACTION	Customer call center records, Invoice, promissory note, check information, Information on teller receipts, Order information, Request and Complaint Information, Debt-Receiveable Information, Customer No, Customer Income Information, Customer Occupation Information, Vehicle License Plate / Vehicle Related Information, Customer Credit Card Statement, Customer Online Activity Information,
FAMILY MEMBERS AND RELATIVES	Identity Information About Data Subject's Children, Spouse, Contact Information About Data Subject's Children, Spouse, Occupation Information About Data Subject's Children, Spouse, Education Information About Data Subject's Children, Spouse
LOCATION	Location Information,
PERSONAL	Payroll/Salary Information, Disciplinary Investigation, Security Investigation, Property Declaration Information, Curriculum Vitae Information/CV, Job Interviews and Evaluations, Employee Social Assistance Information, Social Security Information, Leave / Overwork / Absenteeism / Seniority Period Information, Date of commencement and termination of employment, Place of employment, Performance Evaluation Reports, Information on Travels / Meetings Attended on Behalf of the Company, Vehicle Usage Information, Military Status, Retirement Information, Company Credit Card Expenditure Information,
EMPLOYEE CANDIDATE INFORMATION	Job Application Forms, Job Interviews and Assessments, Cover Letters, CVs,
LEGAL ACTION	Information in correspondence with judicial authorities, Information in case file, Legal Follow-up Information, Intellectual and Industrial Rights or Property Information,
PHYSICAL SECURITY	Employee and visitor entrance - exit records, CCTV records,
RISK MANAGEMENT	Information processed for the management of commercial, technical and administrative risks, Audit and Inspection Records and Reports, KKB Query and Records, Insurance Risk Information and Parameters, Reporting/Assessment of Claims and Complaints, Information Collected on Events with the Potential to Affect the Company - Company Employees - Company Shareholders,
FINANCE	Balance sheet information, Financial performance information, Credit and risk information, Asset information, Credit Card Debt, Loan Payments, Loan Amount, Interest Amount and Rate Payable, Debt Balance, Receivable Balance, Financial Movement Information,
PROFESSIONAL EXPERIENCE	Diploma information, Courses attended, On-the-job training information, Certificates, Transcript information,
MARKETING	Shopping History Information, Targeting Information and Habits of the Person, Reports and Evaluations Showing the Likes of the Person to be Used for Marketing Purposes, Hobbies of the Person to be Used for Marketing Purposes, Surveys Conducted with the Person to be Used for Marketing Purposes, Cookie Records, Information obtained through campaign work,
VIDEO AND AUDIO	Video and audio recordings,



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TİC. A.Ş.
PERSONAL DATA PROTECTION
AND PROCESSING POLICY**

Document No.	ORT.KA.PO.006
Page	15 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

RECORDINGS	
RACE AND ETHNIC BACKGROUND	Race and Ethnic Background Information,
POLITICAL BELIEFS	Information indicating political opinion, Political party membership information,
PHILOSOPHY, RELIGION, SECT AND OTHER BELIEFS	Information on religious affiliation, Information on philosophical beliefs, Information on sectarian affiliation, Information on other beliefs,
APPEARANCE AND ATTIRE	Information on appearance and attire,
ASSOCIATION MEMBERSHIP	Information on association membership,
FOUNDATION MEMBERSHIP	Information on foundation membership,
UNION MEMBERSHIP	Information on union membership,
HEALTH INFORMATION	Blood Type, Device and Prosthesis Information, Hereditary Health Information, Information on Disability Status, Personal Health Information,
SEXUAL LIFE	Information on sexual life
CRIMINAL CONVICTION AND SECURITY MEASURES	Information on criminal convictions, Information on security measures,
BIOMETRIC DATA	Palm Information, Fingerprint Information, Retina scan information, Facial Recognition Information,
GENETICS DATA	Genetics data,
OTHER DATA



**ÜNAL SENTETİK DOKUMA SAN. VE
TİC. A.Ş.
PERSONAL DATA PROTECTION
AND PROCESSING POLICY**

Document No.	ORT.KA.PO.006
Page	16 / 16
Date of Issue	01.07.2022
Revision No.	00
Revision Date	-

Annex – 4 : DATA SUBJECTS

DATA SUBJECT CATEGORY	DESCRIPTION
Person/Customer Who Purchases Product or Service	Natural persons whose personal data are processed during the Company's commercial activities when the Company sells / offers / provides the product or service subject to this commercial activity.
Visitor	Natural persons who have entered the physical premises owned by the Company for various purposes or who visit our websites.
Employee Candidate	Information of natural persons who submit a job application to the Company
Employee	Natural persons who have started to work with an employment contract in various positions in our Company and whose personal data are processed due to personal affairs and situations arising from the law.
Family Members and Relatives	Spouses, children and relatives of data subjects whose personal data are processed under this Policy within the framework of the activities carried out by the Company
Third Party	Other natural persons who are not included in the scope of this Policy (e.g. guarantors, escorts, former employees)
Supplier's Employee	Natural persons who are employees of supplier companies that provide services to our Company on a contractual basis in accordance with the orders and instructions issued by the Company while carrying out the commercial activities of the Company.
Authorized Public Agencies and Institutions	Personal data belonging to the officials and personnel of Authorized Public Agencies and Institutions during the activities carried out by the Company.
Company Official	Company's board members and other authorized natural persons.
Employees, Shareholders and Officials of the Companies with Whom We Have a Business Relationship	Natural persons, including but not limited to shareholders and officials of organizations with whom our Company has any kind of business relationship (including but not limited to business partners, suppliers).
Potential Person Who Purchases Product or Service	Natural persons whose personal data are processed during the Company's commercial activities when the Company will sell / offer / provide the product or service subject to this commercial activity.