



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

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|---------------|---------------|
| Document No. | ORT.KA.PO.004 |
| Page | 1 / 16 |
| Date of Issue | 26.07.2022 |
| Revision No. | 00 |
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SENSITIVE PERSONAL DATA PROTECTION AND
PROCESSING POLICY**

ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş.



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POLICY**

| | |
|---------------|---------------|
| Document No. | ORT.KA.PO.004 |
| Page | 2 / 16 |
| Date of Issue | 26.07.2022 |
| Revision No. | 00 |
| Revision Date | - |

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

Document Name : ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş.
Sensitive 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
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| | |
|---------------|---------------|
| Document No. | ORT.KA.PO.004 |
| Page | 3 / 16 |
| Date of Issue | 26.07.2022 |
| 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 | 5 |
| 4. | DUTIES AND RESPONSIBILITIES | 6 |
| 5. | PRINCIPLES AND PROCEDURES FOR SENSITIVE PERSONAL DATA PROTECTION | 6 |
| 5.1. | Principles of Data Protection | 6 |
| 5.2. | Measures for Processing Sensitive Personal Data | 7 |
| 5.3. | Conditions of Processing Sensitive Personal Data | 8 |
| 5.4. | Purposes of Processing Sensitive Personal Data | 9 |
| 5.5. | Storage and Destruction of Sensitive Personal Data | 9 |
| 5.6. | Transfer of Sensitive Personal Data to Persons in the Country | 9 |
| 5.7. | Transfer of Sensitive Personal Data Abroad | 10 |
| 5.8. | The Company's Obligation to Inform | 11 |
| 6. | RIGHTS OF THE DATA SUBJECT | 11 |
| 6.1. | Rights of the Data Subject | 11 |
| 6.2. | Exercising the Rights of the Data Subject | 12 |
| 6.3. | Our Company's Response to Applications | 12 |
| 7. | MEASURES TAKEN FOR DATA SECURITY | 12 |
| 7.1. | Protecting Sensitive Personal Data | 12 |
| 8. | SENSITIVE PERSONAL DATA PROTECTION AND PROCESSING POLICY'S RELATIONSHIP WITH OTHER POLICIES | 13 |
| 9. | MISCELLANEOUS | 13 |
| 10. | UPDATES | 13 |
| 11. | ENTRY INTO FORCE | 13 |
| 12. | MAINTENANCE | 13 |
| 13. | DISTRIBUTION | 13 |
| 14. | 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 | 16 |



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

| | |
|---------------|---------------|
| Document No. | ORT.KA.PO.004 |
| Page | 4 / 16 |
| Date of Issue | 26.07.2022 |
| 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 sensitive personal data. This policy includes matters regarding the ÜNAL SENTETİK DOKUMA SAN. VE TİC. A.Ş.’s processing of the sensitive personal data owned by the data subjects **according to the order set forth in the KVKK and the Decision Dated 31/01/2018 no. 2018/10 of the Personal Data Protection Board on the “Adequate Measures to be Taken by Data Controllers in Processing Sensitive Personal Data”**, 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

Article 6 of the Personal Data Protection Law no. 6698 (“LAW”) defines “SENSITIVE PERSONAL DATA” as certain personal data that may lead to the victimization or discrimination of the person when processed unlawfully. Sensitive personal data includes data relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance and attire, membership to associations, foundations or trade unions, data concerning health, sexual life, criminal convictions and security measures, and the biometric and genetic data.

This policy involves all sensitive 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 – Sensitive Personal 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- <u>Data subject</u> | : Natural person whose personal data is processed |
| b- <u>Board</u> | : Personal Data Protection Board |
| c- <u>Law</u> | : Personal Data Protection Law no. 6698 |
| d- <u>Personal Data</u> | : All types of identified or identifiable data |
| e- <u>Sensitive Personal Data</u> | : Data relating to the race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and attire, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures of a person and biometric and genetic data |
| f- <u>Explicit Consent</u> | : Freely given consent based on a certain topic, based on being informed |
| g- <u>Processing of Personal Data</u> | : 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- <u>Data Recording System</u> | : A recording system where personal data are structured and processed based on certain criteria |
| i- <u>Data Controller</u> | : 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- <u>Data Controllers Registry</u> | : A public registry system, to which natural or legal persons who process personal data have to register before they start processing any data |
| k- <u>Data Processor</u> | : 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- <u>Erasure of Personal Data</u> | : Personal data being rendered inaccessible and non-reusable for the relevant users |
| m- <u>Destruction of Personal Data</u> | : Personal data being rendered inaccessible, irretrievable and non-reusable for anyone |
| n- <u>Anonymization</u> | : Personal data being rendered non-associable with any identified or identifiable natural person in any way, even by matching with other data |
| o- <u>Recipient Group</u> | : A group of natural or legal persons to whom the personal data are transferred by the data controller |
| p- <u>Relevant User</u> | : 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- <u>Disposal</u> | : The erasure, destruction or anonymization of the personal data |
| r- <u>Periodic Disposal</u> | : 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- <u>Recording Media</u> | : 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- <u>Personal Data Processing Inventory</u> | : An inventory in which data controllers detail the personal data processing activities they carry out depending on their business processes by associating them with |



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

| | |
|---------------|---------------|
| Document No. | ORT.KA.PO.004 |
| Page | 6 / 16 |
| Date of Issue | 26.07.2022 |
| Revision No. | 00 |
| Revision Date | - |

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

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 SENSITIVE PERSONAL DATA PROTECTION

5.1 Principles of Data Protection

ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. processes sensitive personal data according to the principles and procedures set forth in the KVKK and other laws. In this regard, when processing sensitive personal data, ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. 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 DOKUMA SAN. VE TİC. A. Ş. acts in accordance with the principles introduced by legal regulations and the general rule of trust and honesty in the processing of sensitive personal data. Within this framework, sensitive 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 DOKUMA SAN. VE TİC. A. Ş. takes the necessary measures to ensure that sensitive personal data is accurate and up-to-date during the processing period and establishes the necessary mechanisms to ensure the accuracy and currency of sensitive personal data for certain periods of time.

c- Processing for Specified, Explicit and Legitimate Purposes


ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. clearly sets out the purposes of processing sensitive 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 DOKUMA SAN. VE TİC. A. Ş. only collects the sensitive 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 DOKUMA SAN. VE TİC. A. Ş. retains sensitive 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 sensitive 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, sensitive personal data are stored for the period required for the purpose for which they are processed. At the end of the retention periods, the sensitive

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|--|--|----------------------|----------------------|
|  | ÜNAL SENTETİK DOKUMA SAN. VE TİC. A.Ş. SENSITIVE PERSONAL DATA PROTECTION AND PROCESSING POLICY | Document No. | ORT.KA.PO.004 |
| | | Page | 7 / 16 |
| | | Date of Issue | 26.07.2022 |
| | | Revision No. | 00 |
| | | Revision Date | - |

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 MEASURES FOR PROCESSING SENSITIVE PERSONAL DATA

ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. takes the following measures in the capacity of the data controller in the processing of Sensitive Personal Data in accordance with the Board's decision dated 31.01.2018 and no. 2018/10 in accordance with Article 6 of the Personal Data Protection Law:

- This clearly defined, manageable and sustainable Policy has been established for ensuring the security of sensitive personal data.
- For the Employees involved in the processing of sensitive personal data,
 - Regular trainings are provided on the Law and related regulations and the security of Sensitive Personal Data,
 - Confidentiality agreements are signed,
 - The scope and duration of authorization of users who are authorized to access the data are clearly defined,
 - Periodic authorization checks are performed,
 - The authorizations of Employees who had a change of assignment or leave their jobs are immediately removed. In this context, the inventory allocated to him/her by the Data Controller is returned.
- If the environments where Sensitive Personal Data are processed, stored and/or accessed are electronic environments,
 - Personal Data are stored using cryptographic methods,
 - Cryptographic keys are kept in secure and discrete environments,
 - Transaction records of all actions performed on Personal Data are securely logged,
 - The security updates of the environments where Personal Data are stored are constantly monitored, necessary security tests are regularly performed/conducted, and test results are recorded,
 - If Personal Data is accessed through a software, user authorizations of this software are made, security tests of these software are regularly performed / made, and test results are recorded,
 - If remote access to Personal Data is required, as minimum a two-stage authentication system is provided.
- If the environments where Sensitive Personal Data are processed, stored and/or accessed are physical environments;
 - Adequate security measures (against electric leakage, fire, flood, theft, etc.) are taken according to the nature of the environment where Sensitive Personal Data is located,
 - Unauthorized entry and exit are prevented by ensuring the physical security of these environments.
- If the Sensitive Personal Data are to be transferred



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

| | |
|---------------|---------------|
| Document No. | ORT.KA.PO.004 |
| Page | 8 / 16 |
| Date of Issue | 26.07.2022 |
| Revision No. | 00 |
| Revision Date | - |

- If it is necessary to transfer Personal Data via e-mail, they are transferred encrypted with a corporate e-mail address or using a Registered Electronic Mail (KEP) account,
 - If it needs to be transferred via media such as Portable Memory, CD, DVD, it is encrypted with cryptographic methods and the cryptographic key is kept on a different environment,
 - If transfer takes place between servers in different physical environments, data transfer is performed by setting up a VPN between the servers or by using the sFTP method,
 - If the Personal Data are to be transferred via paper media, necessary measures are taken against risks such as theft, loss or unauthorized viewing of the document and the document is sent in “Confidential” format.
- In addition to the aforementioned measures, technical and administrative measures to ensure the appropriate level of security specified in the Personal Data Security Guide which is published on the website of the Personal Data Protection Authority must also be taken into consideration.

5.3 Conditions of Processing Sensitive Personal Data

5.3.1. KVKK regulates the conditions of processing personal data, and ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. processes the personal data according to the following conditions. Aside from the exceptions listed in the Law, ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. only processes the sensitive personal data by obtaining the **explicit consent** of the data subjects and within the limited scope set forth in KVKK m:6/2.

5.3.2. Sensitive Personal Data are processed by the Company in accordance with the Law, provided that the adequate measures to be determined by the Board are taken, in case the following conditions exist:


With the explicit consent of the Data Subject, may only be processed by obtaining the person’s explicit consent.

Without the explicit consent of the Data Subject;

- Sensitive personal data of the Data Subject aside from health and sexual life may be processed in the cases provided for by laws,
- Sensitive personal data of the Data Subject concerning health and sexual life may only be processed by the persons subject to secrecy obligation or competent public institutions and organizations, 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.

5.4 Purposes of Processing Sensitive Personal Data

Personal data are processed by ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş., 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 sensitive personal data processing conditions listed in article 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 sensitive 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 sensitive personal data and detailed information about the categories from the

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|--|---|----------------------|----------------------|
|  | ÜNAL SENTETİK DOKUMA SAN. VE TİC. A.Ş. | Document No. | ORT.KA.PO.004 |
| | SENSITIVE PERSONAL DATA PROTECTION AND PROCESSING POLICY | Page | 9 / 16 |
| | | Date of Issue | 26.07.2022 |
| | | Revision No. | 00 |
| | | Revision Date | - |

document ANNEX 3 (“ANNEX 3 – Sensitive Personal Data Categories”) of this Policy.

5.5 Storage and Destruction of Sensitive Personal Data

ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. stores the sensitive 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 DOKUMA SAN. VE TİC. A. Ş. acts in accordance with the obligations stipulated in all relevant legislation, especially the KVKK and the Decision Dated 31/01/2018 no. 2018/10 of the Personal Data Protection Board on the “Adequate Measures to be Taken by Data Controllers in Processing Sensitive Personal Data” regarding the protection of sensitive 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 DOKUMA SAN. VE TİC. A. Ş. 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.

The sensitive personal data processed may be retained in accordance with the Occupational Health and Safety Law No. 6331, Regulations on Occupational Health and Safety Services (fifteen years). After the expiration of the aforementioned statute of limitations, personal data will be erased, destroyed or anonymized according to the aforementioned procedure.

5.6 Transfer of Sensitive Personal Data to Persons in the Country

Our Company may transfer the legally acquired Sensitive Personal Data of Data Subjects to third parties for the purpose of processing, by taking the necessary safety measures. In this regard, ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. may transfer Sensitive Personal Data to third parties in case one of the conditions of processing and the conditions stipulated below exist.

- Explicit consent of the Data Subject has been obtained,
- Activities related to the transfer of Transfer of Sensitive Personal Data are expressly provided for by the laws,
- It is necessary for the protection of life or physical integrity of the Data Subject or of any other person, and the Data Subject is unable to explain his/her consent due to the physical disability or his/her consent is not deemed legally valid;
- Transfer of personal data is necessary provided that it is directly related to 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 Sensitive Personal Data have been made public by the data subject himself/herself,
- Transfer of Sensitive Personal Data is necessary for the establishment, exercise or protection of any right,



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

| | |
|---------------|---------------|
| Document No. | ORT.KA.PO.004 |
| Page | 10 / 16 |
| Date of Issue | 26.07.2022 |
| Revision No. | 00 |
| Revision Date | - |

- 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.

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.

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

5.7 Transfer of Sensitive Personal Data Abroad

Our Company may exercise due diligence, take the necessary safety measures and the measures accepted by the Board, and transfer the Sensitive Personal Data of the Data Subject to foreign countries with adequate protection or to foreign countries where data controllers who guarantee the adequate protection are located, for the following reasons, in accordance with the purposes of processing the Personal Data.

- With the explicit consent of the Data Subject or
- Without the explicit consent of the Data Subject;
 - Sensitive personal data of the Data Subject aside from health and sexual life (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) may be processed in the cases provided for by laws,
 - Sensitive personal data of the Data Subject concerning health and sexual life may only be processed by the persons subject to secrecy obligation or competent public institutions and organizations, 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

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**”).

5.8 Obligation to Inform

As per article 10 of the KVKK, data subjects must be informed before their sensitive personal data are obtained or at the latest during the acquisition of their sensitive personal data. ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. 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 DOKUMA SAN. VE TİC. A. Ş. 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:

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



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

| | |
|---------------|---------------|
| Document No. | ORT.KA.PO.004 |
| Page | 12 / 16 |
| Date of Issue | 26.07.2022 |
| Revision No. | 00 |
| Revision Date | - |

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 Protecting Sensitive Personal Data

The Law attaches special importance to certain personal data due to the risk of causing victimization or 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 DOKUMA SAN. VE TİC. A. Ş. 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 DOKUMA SAN. VE TİC. A. Ş. for the protection of personal data are carefully implemented in terms of sensitive personal data and necessary audits are carried out within ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş.. In this context, a separate policy has been established on the protection and processing of sensitive personal data.

8. SENSITIVE 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 personal data and for the



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

| | |
|---------------|---------------|
| Document No. | ORT.KA.PO.004 |
| Page | 13 / 16 |
| Date of Issue | 26.07.2022 |
| Revision No. | 00 |
| Revision Date | - |

storage and disposal of personal data.

9. MISCELLANEOUS

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.

10. UPDATES

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

11. ENTRY INTO FORCE

This Policy, which was prepared by ÜNAL SENTETİK DOKUMA SAN. VE TİC. A. Ş. entered into force on the date **22/07/2022**.

12. MAINTENANCE

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

13. DISTRIBUTION

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

14. ANNEXES

ANNEX – 1 : Data Subject Application Form

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

ANNEX – 3 : Sensitive Personal Data Categories

ANNEX – 4 : Data Subjects



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

| | |
|---------------|---------------|
| Document No. | ORT.KA.PO.004 |
| Page | 14 / 16 |
| Date of Issue | 26.07.2022 |
| Revision No. | 00 |
| Revision Date | - |

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

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

- Workplace Physicians
- OSGB – Occupational Health and Safety Specialist and Companies
- Legally Authorized Public Agencies and Institutions



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

| | |
|---------------|---------------|
| Document No. | ORT.KA.PO.004 |
| Page | 15 / 16 |
| Date of Issue | 26.07.2022 |
| Revision No. | 00 |
| Revision Date | - |

ANNEX – 3 : Sensitive Personal Data Categories

| | |
|---|---|
| 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, |



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

| | |
|---------------|---------------|
| Document No. | ORT.KA.PO.004 |
| Page | 16 / 16 |
| Date of Issue | 26.07.2022 |
| Revision No. | 00 |
| Revision Date | - |

Annex – 4 : DATA SUBJECTS

| DATA SUBJECT CATEGORY | DESCRIPTION |
|-----------------------|---|
| 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. |
| | |
| | |