

MAKTEL MAKINE VE TEL SANAYII A.S. CLARIFICATION TEXT FOR PROTECTION AND PROCESSING OF PERSONAL DATA

1. Data Controller

Your personal data may be processed by MAKTEL MAKINE VE TEL SANAYII A.S., located at the address of Buyukbakkalkoy Mah. Maltepe Cad.No:7 Maltepe / ISTANBUL, ("Maktel Makina") in its capacity of data controller, within the scope described below by protecting the accuracy and up-to-dateness of the personal data as received by us within the framework of the purposes listed below and in connection with, as limited to and to the extent of these purposes in accordance with the Law.

2. Collection of Personal Data and Purposes of Processing

Maktel Makina can obtain personal data directly from the data owners themselves, as well as indirectly from third parties and from the data that the data owner has made public. Your personal data collected may be processed by Maktel Makina mainly for the fulfillment of the duties and obligations set forth in the Law No. 6102, and ensuring the legal, technical, commercial and business security of Maktel Makina and the relevant persons who are in business relationship with Maktel Makina and the performance of the operations in the management processes of the personal data of the data owners in accordance with the basic principles stipulated in the Law and within the scope of the personal data processing conditions specified in the Articles 5 and 6 of the Law. In this regard, personal data may be collected verbally, physically or electronically and subjected to processing within the scope of the operations of Maktel Makina.

	IDEN	NTITY DATA	
Data of Identity Category	Data Subject Group	Method of Obtaining Data	Purpose of Processing Personal Data
Name and Surname	•Employee		•Fulfilling the obligations set forth in the Labor Law No.
•Gender	•Employee Candidate	themselves in job application, business partnership,	•Conducting selection and placement of employee
•Nationality	•Shareholder/Partner	commercial relationship, internship application,	candidates/interns/students
• Date or birth	•Supplier's employee	receiving supply services, obtaining information,	•Conducting the application processes of employee candidates
• Place of birth	•Supplier's official	receiving requests or	Candidates
•Signature	•Visitor	complaints, goods/service sales and shipment processes,	Conducting employee satisfaction and loyalty processes
•T.R. Identity No.:	Business Partner	training and similar activities.	•Fulfillment of obligations arising from employment contract and legislation for employees
Passport No	•Customer		•Conducting benefits and interests processes for
	•Customer's employee/official		employees
	Potential business partner's employee/official		Conducting Audit/Ethical activities
	Potential supplier's employee/official		Conducting training activities
	Potential customer's employee/official		Conducting financing and accounting affairs
	Potential business partner		•Conducting operations in accordance with the legislation
	•Subcontractor's employee/official		• Arranging visa, customs clearance and similar procedures within the scope of export operations
			Conducting Goods/Services purchase processes
			Conducting Goods/Services production and operation processes
			•Conducting activities related to customer satisfaction
			•Planning customer relations management
			Conducting Goods/Services sales processes
			•Reporting business operations
			Conducting contract processes
			Conducting products/services marketing processes
			Conducting communication operations
			•Following up requests / complaints
			•Providing information to authorized persons, authorities and organizations
			•Conducting supply operations
			•Developing and following up visitor records
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Legal Reasons

Law No. 6698 - Article 5/2 (a): Express stipulation in the Laws

Law No. 6698 - Article 5/2 (c): Necessity to process the personal data of the parties to the contract provided that it is directly related to the execution or performance of a contract



freedoms of the relevant persons.

	COMMU	NICATION DATA	
Data of the Communication Category	Data Subject Group	Method of Obtaining Data	Purpose of Processing Personal Data
•Address	•Employee	_	•Fulfilling the obligations set forth in the Labor Law No.
•Email address	•Employee Candidate	themselves in job application, business partnership,	
•Residence	•Shareholder/Partner	membership, internship application, receiving supply	•Conducting the application processes of employee candidates
•Communication address	•Supplier's employee	services, customer relationship	•Fulfillment of obligations arising from employment
Phone Number	•Supplier's official	management, obtaining information, receiving	contract and legislation for employees
	•Visitor		Conducting Audit/Ethical activities
	•Business Partner	surveys, news, training and similar activities.	•Conducting training activities
	•Customer		•Conducting financing and accounting affairs
	•Customer's employee/official		•Conducting operations in accordance with the legislation
	•Potential business partner's employee/official		•Arranging visa, customs clearance and similar procedures within the scope of export operations
	•Potential supplier's employee/official		•Conducting Goods/Services purchase processes
	•Potential customer's employee/official		Conducting Goods/Services sales processes
	Potential business partner		•Conducting Goods/Services production and operation processes
	•Subcontractor's employee/official		•Conducting activities related to customer satisfaction
			•Conducting contract processes
			•Conducting products/services marketing processes
			•Completing product sample and testing operations
			•Conducting communication operations
			•Following up requests / complaints
			•Providing information to authorized persons, authorities and organizations
			•Conducting supply operations
		gal Reasons	

Legal Reasons

Law No. 6698 - Article 5/2 (a): Express stipulation in the Laws

Law No. 6698 - Article 5/2 (c): Necessity to process the personal data of the parties to the contract provided that it is directly related to the execution or performance of a contract

Law No. 6698 - Article 5/2 (ç): Fulfillment of legal obligations

Law No. 6698 - Article 5/2 (d): It has been made public by the relevant persons themselves.

Law No. 6698 - Article 5/2 (e): Obligation for processing data for the establishment, exercise or protection of a right.

Law No. 6698 - Article 5/2 (f): Obligation for processing data for the legitimate interests of the data controller provided that it will not harm the fundamental rights and freedoms of the relevant persons.

	LOC	ATION DATA	
Data of the Location Category	Data Subject Group	Method of Obtaining Data	Purpose of Processing Personal Data



•GPS	•Employee	Location data is obtained	Conducting Information Security Processes
		through automatic means.	• Conducting Audit / Ethical Activities
			• Conducting Operations in accordance with the Legislation
			• Conducting Assignment Processes
			• Conducting Communication Operations
			• Planning Human Resources Processes
			• Conducting Operations for Ensuring Business Continuity
			Conducting Logistic Operations
			• Conducting Goods / Service Purchase Processes
			• Conducting Goods / Services Sales Processes
			 Conducting Goods / Services Production and Operation Processes
			• Ensuring Security of Movable Properties and Resources
			Ensuring Security of Data Controller Operations

Law No. 6698 - Article 5/2 (f): Obligation for processing data for the legitimate interests of the data controller provided that it will not harm the fundamental rights and freedoms of the relevant persons.

	PHYSICAL SPACE SECURITY DATA			
Data of Physical Space Security Category	Data Subject Group	Method of Obtaining Data	Purpose of Processing Personal Data	
•Entry-exit records	●Employee		•Fulfillment of the obligations included in the Labor Law	
• Camera records at the locations of	•Employee Candidate	and by means of the security	No. 4857 and the relevant legislation	
Maktel Makina	•Shareholder/Partner	cameras from the entry.	Conducting audit and ethical activities	
	•Supplier's employee		•Ensuring physical space security	
	•Supplier's official		Performing activities to ensure business continuity	
	•Potential supplier's employee/official		Conducting goods/service purchase processes	
	•Visitor		•Providing information to authorized persons, authorities and organizations	
	•Customer		Developing and following up visitor records	
	•Customer's official/employee			
	Potential business partner's employee/official			
	•Potential customer's employee/official			
	 Potential business partner 			
	•Subcontractor's employee/official			
	Business Partner			

Legal Reasons

Law No. 6698 - Article 5/2 (e) Obligation for processing data for the establishment, exercise or protection of a right.

Law No. 6698 - Article 5/2 (f): Obligation for processing data for the legitimate interests of the data controller provided that it will not harm the fundamental rights and freedoms of the relevant persons.

	TRANSACTION SECURITY DATA			
Data of Transaction Security Category	Data Subject Group	Method of Obtaining Data	Purpose of Processing Personal Data	
Cookie Records	•Employee		•Fulfillment of the obligations included in the Law No.	
•IP address details	•Visitor	providing connection to the	5651 on Regulation of Publications on the Internet and Suppression of Crimes Committed by means of such	
•IP Address Monitoring		internet via the network of Maktel Makina, receiving	Publications and the relevant legislation	
•Internet Access Recording Logs		services via the call center,	•Ensuring physical space security	
•Website login/logout details		and communicating with Maktel Makina via the call	•Developing and following up visitor records	
•System and Application User Account		center or at e-mail address.	Conducting information security processes	
Details (User names, e-mail accounts, last login dates, IP details etc.)			Conducting access authorizations	
•Code and password details etc.			•Conducting operations in accordance with the legislation	
-			•Conducting communication operations	



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	and organizations
	•Providing information to authorized persons, authorities
	•Ensuring security of data controller operations
	•Following up requests / complaints
	•Conducting / auditing operations of Maktel Makina

Law No. 6698 - Article 5/2 (ç): Fulfillment of legal obligations Law No. 6698 - Article 5/2 (a): Express stipulation in the Laws

	VISUAL AND AUDIO DATA		
Data of Visual and Audio Records Category	Data Subject Group	Method of Obtaining Data	Purpose of Processing Personal Data
•Photo	•Employee		•Fulfillment of the obligations specified in the Law No.
Camera Records	•Employee Candidate	Γ	4857 and the relevant legislation,
		Makine during job application and closed circuit security	•Conducting human resources processes
•Sound Records	• V1SITOT		•Ensuring physical space security
			Conducting operations in accordance with the legislation
			•Conducting communication operations
			•Conducting / auditing of operations of Maktel Makina
			•Ensuring security of movable goods and resources
			•Ensuring security of data controller operations
			•Providing information to authorized persons, authorities and organizations
			•Developing and following up visitor records

Legal Reasons

Law No. 6698 - Article 5/2 (c): Fulfillment of legal obligations Law No. 6698 - Article 5/2 (a): Express stipulation in the Laws

	CUSTOMER TRANSACTION		
Data of Customer Transaction Category	Data Subject Group	Method of Obtaining Data	Purpose of Processing Personal Data
•Invoice	•Customer	It is obtained from the relevant	•Fulfillment of the obligations within the framework of
Note		officer/employee for planning	the Tax Procedures Law No. 213 and related secondary legislation regulations
•Cheque		and conducting the goods and/or service purchase and	•Conducting financing and accounting affairs
• Purchase details		sale processes.	•Conducting goods/service purchase processes
•Request details			Conducting Goods/Services sales processes
			Conducting Goods/Services production and operation processes
			•Planning goods/services sales processes
			Conducting products/services marketing processes

Legal Reasons

Law No. 6698 - Article 5/2 (c): Establishment or performance of the contract Law No. 6698 - Article 5/2 (c): Fulfillment of legal obligations

		INANCE	
Data of Finance Category	Data Subject Group	Method of Obtaining Data	Purpose of Processing Personal Data
Bank details	•Employee		•Fulfillment of the obligations arising from the Labor
•Account details		official/employee for the	Law No. 4857 •Fulfillment of obligations arising from employment
•Card details	•Supllier	murbase at carrying all the	contract and legislation for employees
		Γ -	Conducting financing and accounting affairs
		arising from the sales contract,	Conducting goods/service purchase processes
		and performing the actions	Conducting Goods/Services sales processes
		within the scope of the employment contract.	•Conducting wage policy
			•Conducting investment processes

Legal Reasons

Law No. 6698 - Article 5/2 (c): Establishment or performance of the contract Law No. 6698 - Article 5/2 (c): Fulfillment of legal obligations



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Data of Marketing Category	Data Subject Group	Method of Obtaining Data	Purpose of Processing Personal Data
Shopping history details	•Customer		•Carrying out the processes of loyalty to products and services of Maktel Makina
		purchase and sale processes.	•Conducting customer relations management processes
			•Conducting activities for customer satisfaction
			•Planning and conducting marketing analysis studies
			•Conducting advertising/campaign/promotion processes
		egal Reasons	
	Law No. 6698 - Article 5/2 (c): E	Establishment or performance of t 2 (ç): Fulfillment of legal obligat	
		ONAL EXPERIENCE	1
Data of Professional Experience Category	Data Subject Group	Method of Obtaining Data	Purpose of Processing Personal Data
Diploma details,	•Employee		•Fulfillment of the obligations specified in the Law No
Courses attended,	•Employee candidate	applications made for the purpose of ensuring the	4857 and the relevant legislation,
On-the-job training data,		employment of employees,	•Conducting job application processes
Certificates,		applications for the recruitment of interns and	•Conducting human resources processes
Franscript details		sharing the personal	Conducting communication operations
· · · · · ·		information of the supplier's employees for providing	•Conducting / auditing of operations of Maktel Makina
		services.	 Providing information to authorized persons, authorities and organizations
			and organizations
	I	egal Reasons	
	Law No. 6698 - Article 5/2 (c): E		he contract
	Law No. 6698 - Article 5/2	2 (ç): Fulfillment of legal obligat	
Data of Sensitive Data Category	Data Subject Group	ICAL DETAILS Method of Obtaining Data	Purpose of Processing Personal Data
Medical Reports	• Employee		Conducting Information Security Processes
Medical History			• Fulfillment of Obligations Arising from Employment
Disability Details		employees in order to provide service.	Contract and Legislation for Employees
			 Conducting Benefits and Interests Processes for Employees
			• Conducting Audit / Ethical Activities
			Conducting Operations in accordance with the
			Legislation • Planning Human Resources Processes
			Conducting / Auditing Business Operations
			• Conducting Operations for Ensuring Business
			ContinuityProviding Information to Authorized Persons,
			Institutions and Organizations
		egal Reasons Article 6/2: Explicit Consent	
		ON AND SECURITY MEASU.	RES
Data of Sensitive Data Category	Data Subject Group	Method of Obtaining Data	Purpose of Processing Personal Data
Criminal Record	• Employee	It is obtained by sharing the personal information of the	 Conducting Information Security Processes Conducting Audit / Ethical Activities
		employees in order to provide	• Conducting Operations in accordance with the
		service.	Legislation • Planning Human Resources Processes
			• Ensuring Security of Movable Properties and Resources
			• Ensuring Security of Data Controller Operations
	L	egal Reasons	
	Law No. 6698 - A	Article 6/2: Explicit Consent OTHER	
Data of Professional Experience Category	Data Subject Group	Method of Obtaining Data	Purpose of Processing Personal Data
Body Height-Weight Details	• Employee	It is obtained in order to be	• Fulfillment of Obligations Arising from Employment
Reference Details		recorded in the personnel	Contract and Legislation for Employees • Conducting Benefits and Interests Processes for
Military Service Status Information		file by the employee during employment and for the	• Conducting Benefits and Interests Processes for Employees
Marriage Certificate Birth-Death reports		establishment of the	• Conducting Audit / Ethical Activities • Conducting Operations in accordance with the
Vehicle Number Plate Details		benefits provided by Maktel	 Conducting Operations in accordance with the Legislation
		Makine and for recording the vehicle details entering	• Conducting Assignment Processes
		the vehicle details entering	Planning Human Resources Processes



to and exiting from the physical locations of Maktel Makina.

• Conducting / Auditing Business Operations

Legal Reasons

Law No. 6698 - Article 5/2 (e) Obligation for processing data for the establishment, exercise or protection of a right.

Law No. 6698 - Article 5/2 (f): Obligation for processing data for the legitimate interests of the data controller provided that it will not harm the fundamental rights and freedoms of the relevant persons.

4. Parties to whom Your Personal Data is transferred and Purposes of Transfer

Your personal data collected may be transferred to our business partners, suppliers, customers, legally authorized public/private institutions and organizations within the scope of the above-mentioned purposes by Maktel Makine and to our business partners and branches abroad, provided that it is limited and required, if you have explicit consent in accordance with the basic principles stipulated in the Law and within the personal data processing conditions specified in the Articles 8 and 9 of the Law,.

	IDENTITY DATA
Parties to whom Personal Data is transferred	Purpose of Transferring Personal Data
• Real persons or private legal entities • Public to All • Authorized public institutions organizations • Business Partners • Suppliers	Conducting the application processes of employee candidates Fulfillment of obligations arising from employment contract and legislation for employees Conducting benefits and interests processes for employees Conducting Audit/Ethical activities Conducting training activities Conducting financing and accounting affairs Conducting operations in accordance with the legislation Arranging visa, customs clearance and similar procedures within the scope of export operations Conducting Goods/Services purchase processes Conducting Goods/Services production and operation processes Conducting Goods/Services production and operation Planning customer relations management Conducting Goods/Services sales processes Conducting contract processes Conducting products/services marketing processes Conducting products/services marketing processes Conducting communication operations Following up requests / complaints Providing information to authorized persons, authorities and organizations Conducting supply operations
	COMMUNICATION DATA
Parties to whom Personal Data is transferred	Purpose of Transferring Personal Data
•Real persons or private legal entities •Authorized public institutions organizations •Business Partners •Suppliers Parties to whom Personal Data is transferred	Conducting the application processes of employee candidates Fulfillment of obligations arising from employment contract and legislation for employees Conducting Audit/Ethical activities Conducting training activities Conducting financing and accounting affairs Conducting operations in accordance with the legislation Arranging visa, customs clearance and similar procedures within the scope of export operations Conducting goods/services purchase and sales processes Conducting Goods/Services production and operation processes Conducting activities related to customer satisfaction Conducting contract processes Conducting products/services marketing processes Conducting communication operations Following up requests / complaints Providing information to authorized persons, authorities and organizations Conducting supply operations PHYSICAL SPACE SECURITY DATA Purpose of Transferring Personal Data
•Authorized public institutions and organizations	 Fulfillment of the obligations included in the Labor Law No. 4857 and the relevant legislation Conducting goods/services purchase and sales processes Ensuring physical space security Providing information to authorized persons, authorities and organizations Developing and following up visitor records Performing activities to ensure business continuity Conducting audit and ethical activities TRANSACTION SECURITY DATA
Parties to whom Personal Data is transferred	Purpose of Transferring Personal Data
•Authorized public institutions organizations	 Fulfillment of the obligations included in the Law No. 5651 on Regulation of Publications on the Internet and Suppression of Crimes Committed by means of such Publications and the relevant legislation Ensuring physical space security Conducting information security processes Conducting operations in accordance with the legislation Conducting / auditing operations of Maktel Makina Following up requests / complaints Ensuring security of data controller operations Providing information to authorized persons, authorities and organizations



VISUAL AND AUDIO DATA	
Parties to whom Personal Data is	Purpose of Transferring Personal Data
transferred	
•Authorized public institutions	and •Fulfillment of the obligations specified in the Law No. 4857 and the relevant legislation,
organizations	•Conducting human resources processes
	•Ensuring physical space security
	•Conducting / auditing operations of Maktel Makina
	 Providing information to authorized persons, authorities and organizations
	•Ensuring security of movable goods and resources
	•Ensuring security of data controller operations
	•Providing information to authorized persons, authorities and organizations
	•Developing and following up visitor records
	CUSTOMER TRANSACTION
Parties to whom Personal Data is	
transferred	Purpose of Transferring Personal Data
•Real persons or private legal entities	•Fulfillment of the obligations within the framework of the Tax Procedures Law No. 213 and related secondary legislation
• Authorized public institutions and	regulations
organizations	•Conducting financing and accounting affairs
Business Partners	•Conducting goods/services purchase and sales processes
	Conducting Goods/Services production and operation processes
	•Conducting products/services marketing processes
	•Conducting Audit/Ethical activities
	FINANCE
Parties to whom Personal Data is	
transferred	Purpose of Transferring Personal Data
•Real persons or private legal entities	•Fulfillment of the obligations arising from the Labor Law No. 4857
• Authorized public institutions and	•Fulfillment of obligations arising from employment contract and legislation for employees
organizations	•Conducting financing and accounting affairs
organizations	Conducting financing and accounting arrains Conducting goods/services purchase and sales processes
	• Conducting wage policy
	•Conducting investment processes MARKETING
Parties to whom Personal Data is	
transferred	Purpose of Transferring Personal Data
•Real persons or private legal entities	•Carrying out the processes of loyalty to products and services of Maktel Makina
• Authorized public institutions and	•Conducting customer relations management processes
organizations	•Conducting activities for customer satisfaction
	•Planning and conducting marketing analysis studies
	•Conducting advertising/campaign/promotion processes
	PROFESSIONAL EXPERIENCE
Parties to whom Personal Data is	Purpose of Transferring Personal Data
transferred	- m- F 333 32 m-3333 m - m - m - m - m - m -
•Real persons or private legal entities	•Fulfillment of the obligations specified in the Law No. 4857 and the relevant legislation,
• Authorized public institutions	and •Conducting job application processes
organizations paone institutions	•Conducting human resources processes
Business Partners	•Conducting communication operations
- Business Farthers	
	•Conducting / auditing of operations of Maktel Makina •Providing information to authorized persons, authorities and organizations
	•Providing information to authorized persons, authorities and organizations MEDICAL DETAILS
Parties to whom Personal Data	
Parties to whom Personal Data transferred	is a urpose of fransferring reisonal Data
•Real persons or private legal entities	Conducting Emergency Management Processes
• Authorized public institutions	and Fulfillment of Obligations Arising from Employment Contract and Legislation for Employees
organizations	• Conducting Benefits and Interests Processes for Employees
 Business Partners 	• Conducting Assignment Processes
	Planning Human Resources Processes
	Planning Human Resources Processes

5. Collection Method of and Legal Reason for Your Personal Data

Your personal data may be collected by Maktel Makina in electronic environment via e-mail, mobile application, website, open internet resources, social media, telephone, SMS and call center channels and in physical environment via hand delivery or mail channels. Furthermore, your personal data shall be collected based on the establishment and/or performance of the contract specified in the Articles 5 and 6 of the Law, the establishment, exercise and/or protection of a right, the fulfillment of the legal obligation and the legal reasons described above and, if necessary, your explicit consent.

6. As Personal Data Owner Your Rights Listed in the Article 11 of the Law

Pursuant to the Article 11 of the Law, we notify that you, as the data owners, have the following rights:

- > To learn whether the personal data has been processed or not,
- > To request relevant information if your personal data has been processed,
- > To learn the purpose of processing your personal data and whether your personal data is used as suitable for the purpose,
- > To know the third persons to whom the personal data has been transferred in the country or in abroad,
- > To request the correction of the personal data if the personal data has been processed deficiently or incorrectly and to request the notification of the procedure that is performed within this scope to the third persons to whom the personal data has been transferred,
- > To request the deletion or destruction of the personal data if the reasons requiring the processing of the personal data disappear although the personal data has been processed in compliance with the provisions of the Personal Data Protection Law and the other relevant law provisions and to request the notification of the procedures performed within this scope to the third persons to whom the personal data has been transferred,



> To object to the occurrence of a result against you by analyzing the processed personal data exclusively via automatic systems, > To request the elimination of the damage if you are exposed to damage due to the processing of your personal data in contrary to the Law. With regard to your requests for your rights listed above, you can forward your request petition that contains the minimum requirements set forth in the Communique on Procedures and Principles for Application to Data Controller as written and wet-signed to the address of Buyukbakkalkoy Mah. Maltepe Cad. No: 7 Maltepe / ISTANBUL where the registered office of the Company is located by hand, send it via notary public, send as electronically signed via KEP addressmaktelmakina@hs03.kep.tr or forward it to our Company via the e-mail address kvkk@maktel.com.tr in the case that your e-mail address is registered in our Company's systems.