

## **PERSONAL DATA PROTECTION AND PROCESSING REAL PERSON-SUPPLIER- PARTNER- REAL PERSON REPRESENTATIVE-VISITOR CLARIFICATION TEXT**

**NKT TARIM VE GIDA SANAYİ TİCARET LİMİTED ŞİRKETİ** (“Company”), the data controller under the title of Article 10 ‘Obligation of Controller to Inform’ of the Law No. 6698 on Protection of Personal Data (“PPD”), is obliged to inform the concerned persons (in other words, ‘data subjects’) about the identity of the data controller, the purposes of personal data processing, the persons to whom the personal data was transferred and the purposes of transfer, the legal reasons and methods of collecting the personal data, the rights listed in the 11th article ‘The Rights of Data Subject’ of the PPD.

In accordance with the provisions of Article 10 of PPD, data subjects are informed and enlightened with this Clarification Text.

### **Personal Data Processed:**

**Identity Data:** Name, surname, T.C. Identification number,

**Contact Data:** Email address, address and phone number,

**Financial Data:** Bank account information,

**Legal Action:** Legal Action (such as information in correspondence with judicial authorities, information in the case file)

**Customer Transaction:** (such as invoice, promissory note, check information, information in payment instruments, (Mail order etc.) order information, request information)

**Transaction Security:** (such as IP address information, website login and exit information, password and password information)

**Risk Management:** (such as information processed to manage commercial, technical, administrative risks)

**Physical Space Security:** (Such as visitor’s entrance and exit registration information, camera recordings)

**Visual Data:** Camera recordings,

**For Online Visitors visiting the Website:** Transaction Security Information (IP address) For Online Visitors who fill out the forms on the Website, – Identity Information (name, surname), – Contact Information (e-mail address, phone number, etc.)

### **Method and Legal Reason of Personal Data Collection:**

Your personal data; The information you transmit to us through our corporate website or via e-mail or other means, or during our business relations, during the signing of commercial contracts and / or during the commercial relationship period, is stored in various ways, through verbal, written or electronic media, through various channels such as physical forms.

However, personal data are included in paragraph 2 of Article 5 of the Law.

(i) Clearly prescribed by law

(ii) (ii) is mandatory for the data controller to fulfill its legal obligation,

(iii) Data processing is mandatory for the establishment, use or protection of a right,

(iv) Providing that data processing is mandatory for the legitimate interests of the data controller can be processed without seeking explicit consent, provided that it does not harm the fundamental rights and freedoms of personal data owners.

### **Purposes of Processing Personal Data:**

- Execution of Emergency Management Processes
- Execution of Training Activities
- Execution of Access Rights
- Execution of Activities in Compliance with the Legislation
- Execution of Financial and Accounting Affairs
- Ensuring Physical Space Security
- Legal Affairs Monitoring and Execution
- Conducting Communication Activities
- Planning Human Resources Processes
- Execution / Control of Business Activities
- Execution of Occupational Health / Safety Activities
- Conducting Business Continuity Activities
- Execution of Logistics Activities
- Execution of Goods / Services Purchasing Processes

- Execution of Goods / Services After Sales Support Services
- Execution of Goods / Services Sales Processes
- Execution of Goods / Services Production and Operation Processes
- Execution of Customer Relationship Management Processes
- Conducting Activities for Customer Satisfaction
- Execution of Storage and Archive Activities
- Execution of Contract Processes
- Requests / Complaints Tracking
- Execution of Supply Chain Management Processes
- Execution of Wage Policy
- Execution of Marketing Processes of Products / Services
- Ensuring the Security of Data Responsible Operations
- Giving Information to Authorized Persons, Institutions and Organizations
- Execution of Management Activities

In the event that personal data is clearly foreseen in the law or in accordance with the other conditions stated in the second paragraph of Article 5 of the Law, depending on the transactions made by the Online Visitor on the Website;

- In case the forms in the communication title are filled, in order to carry out / supervise business activities, to carry out customer relations management processes, to follow up requests / complaints and to carry out communication activities within this scope,
- In order to carry out "Site traffic information" information security processes, (In addition, according to Law No. 5651 and other legislation, the Site Provider has the obligation to record and store site traffic information.)
- Information obtained through cookies is processed for the purpose of carrying out information security processes. Personal data are not processed for the purpose of sending commercial electronic messages.

### **To Whom and For What Purpose the Processed Personal Data Can Be Transferred**

Personal data, if one of the conditions in paragraph 2 of Article 5 is found, limited to the purposes specified in the fourth article of this text, can be transferred to the Company's subsidiaries, affiliates, business partners and authorized public institutions and organizations, provided that the necessary security measures are taken within the framework of the conditions specified in Articles 8 and 9 of the Law.

(For example; UETDRS Transportation Electronic Tracking and Control System, Winlak Customer program is transferred through Luca Accounting program.)

The transfer of Personal Data is subject to the explicit consent of the person concerned, in the absence of any of the conditions in paragraph 2 of Article 5 of the Law.

**Rights of the Person Related to the Article 11 of the Law:**

The Company notifies other relevant (personal data subject) rights of the Law for Article 10, provides guidance on how to exercise such rights, and performs the necessary internal functioning, administrative and technical arrangements for all.

Personal data subjects pursuant to Article 11 of the Law have the right to demand;

- To learn whether personal data is processed,
- Requesting information about this if personal data has been processed,
- Learning the purpose of processing personal data and whether they are used in accordance with their purpose,
- To know the third parties to whom their personal data are transferred domestically or abroad,
- Requesting correction of personal data if it is incomplete or incorrectly processed
- Requesting the deletion or destruction of personal data within the conditions stipulated in article 7 of the Law,
- Requesting the third parties to whom the personal data of the transactions (correction and destruction of the data) made in accordance with the clauses (d) and (e) of Article 11 of the Law are transferred,
- To object to the emergence of a result against you by analyzing the processed data exclusively through automated systems,
- In the event that personal data is damaged due to unlawful processing.

Pursuant to paragraph 1 of Article 13 of the PPD Law, you can forward your request regarding the exercise of your rights mentioned above to our Company by the method (s) determined / determined by the Personal Data Protection Board.

By filling out the Personal Data Subject Application Form under the Law No. 6698 on the Protection of Personal Data at [www.nktfoods.com](http://www.nktfoods.com) , together with the documents that determine your identity and your requests containing your explanations regarding the right you want to use from the rights stated in article 11 of the Law;

Alternatively, if you wish

You can send your hand-written application and a copy of it with the original signature of the person to “İçerenköy Mah. Değirmen Yolu Cad. No: 23 İç Kapı No: 9 Atasehir / ISTANBUL ” by hand delivery,

You can send it to our address above via notary or registered mail,

You can send an e-mail to **info@nktfoods.com** with your application documents. In requests and applications; Name, surname and signature of the applicant in writing, to the citizens of the Republic of Turkey T. C. identity number, nationality for foreigners, passport number or identity number, if any, residence or business address based on notification, e-mail address based on notification, telephone and fax number,

The subject of the demand must be found. Information and documents on the subject should be attached to the application.

The company concludes the requests in the application free of charge as soon as possible and within thirty days at the latest, depending on the nature of the request. However, in case the transaction in question also requires a cost, the fee in the tariff determined by the Board may be charged.

The company may accept the request, refuse it by explaining its justification and inform the person in writing or electronically. In case the request in the application is accepted, the Company fulfills its requirement as soon as possible and informs the concerned person. In case the application is caused by the Company's error, the fee collected is returned to the relevant person.

In case the application is rejected, the answer given is insufficient or the application is not answered in due time; the person concerned has the right to complain to the Board within thirty and possibly sixty days from the date of application.

**Data Security:**

The company is obliged to take all necessary administrative and technical measures to prevent unlawful processing of personal data and unlawful access to personal data, to ensure the protection of personal data and to ensure the appropriate level of security.

**Changes:**

**NKT TARIM VE GIDA SANAYİ TİCARET LİMİTED ŞİRKETİ** reserves the right to make changes in this disclosure due to changes in the Personal Data Protection Law or the method of processing Personal Data by our company.

**CONTACT**

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