

Portunus®

CLARIFICATION DOCUMENT FOR PROTECTION AND PROCESSING OF PERSONAL DATA

This clarification document is prepared by Portunus AES Yedek Parça ve Servis A.Ş. as the data supervisor under Article 11 of 6698 Law on Protection of Personal Data and Communiqué on the Procedures and Principles to be Complied with in Fulfilling the Obligation to Clarify.

1. Data Supervisor Identity

According to the 6698 Law on Protection of Personal Data (“6698 Law”), your personal data can be processed by Portunus AES Yedek Parça ve Servis A.Ş. (“Company”) as data supervisor for the scope explained below.

Website: https://www.portunus.com.tr/portunus_english.html

Phone: +90 216 571 90 00

Email: portunus@portunus.com

Address: Aydınlı-KOSB Analitik Cd. No: 48 Tuzla 34956 İstanbul / Turkey

2. Personal Data Processing Purpose

Your personal data is processed by Portunus AES Yedek Parça ve Servis A.Ş. to execute our foreign trade activities, establish a permanent company, operate under laws and commercial ethics, to be open for development, to be competitive, to organize promotion, advertisement, campaign and social responsibility projects, to plan and execute all the necessary activities to promote the products and services provided by our holding company, execute the necessary operational activities, plan and execute all company commercial and/or business strategies, undertake the necessary work by the related departments to execute the activities of the company, to execute the related business processes and to sustain our company for the establishment purposes,

Training, Internship, Events, Programs, Exhibitions,

To make job applications, assess these applications, execute the process if the job application has a positive outcome and inform the individuals about the results,

To undertake all legal obligations under all related regulations,

To undertake the commercial activities of Portunus,

To undertake the internal regulations of Portunus,

To ensure the safety and internal audit of Portunus locations and employees,

To identify and execute Portunus commercial and business strategies,

To execute Portunus’s human resources policy,

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To create and manage information technology infrastructure, plan or execute the activities for business continuity, plan or execute the corporate communication activities, plan or execute event management, supply activities and corporate sustainability activities,

To undertake the storage, notification, reporting and other liabilities defined in the regulation,

To undertake the contractual liabilities,

To undertake all the actions for the quality and continuity of the job,

To meet the information and other requests from public institutions and other shareholders on time,

To execute the contractual and legal liabilities completely and sufficiently,

To follow the financial and/or accounting operations,

To follow the legal processes and execution of the legal processes,

To plan and execute the human resources processes,

To plan, audit and execute the information and data security processes,

To audit and improve quality and standards,

To ensure organizational and employee safety,

To ensure coordination among visitors and meeting participants in related processed,

To expand and diversify the support and services,

To assess, answer all types of recommendations/wishes/complaints and demands by shareholders and visitors via all types of channels and improve based on the notification.

Without being limited to the above-mentioned items, your personal data is processed for our company to execute and undertake the services authorized by the related laws.

3. Personal Data Collection Method and Legal Reasons

Your personal data are collected in automatic or manual, written, verbal, electronic or similar manner via online channels, social media accounts by different departments and different channels in our company including but not limited to email, corporate communication, business development, strategy development, marketing and CRM (customer relations management) for the above-mentioned legal purposes, to develop the services provided by our Company and to execute all types of commercial activities.

Within this framework, your personal data can be processed and transferred without open consent if collected with open consent specified in article 4(2) of KVKK or in case of situations stated in articles 5(2) and 6(3).

4. Personal Data Transfer

Your personal data can be transferred for the above-mentioned purposes and set forth by article 8 and 9 of the Law: by being limited with the above-mentioned purposes with our business partners, shareholders, subsidiaries, authorized public institutions and organizations, private individuals to execute our activities and to independent auditing companies under legal obligations and regulations.

Additionally, your personal data can be transferred to our suppliers, solutions partners, contracted companies, organizations and institutions as well as banking and financial institutions to undertake the banking and financial operations such as wage payment without being limited to

undertake the contractual terms or to receive the required services under the contracts.

5. Rights of Data Owner

The individuals whose personal data is processed in the Holding have the following rights under article 11 of the Law:

- Learn whether your personal data is processed.
- Demand information if your personal data is processed.
- Learn the purpose to process your personal data and whether such data is used purposefully.
- Learn the third parties which can either be national or international that your personal data is transferred.
- Ask for correction when your personal data is incorrect or missing and learn whether your data is transferred to third parties.
- Ask to delete or destroy your personal data, inform third parties about the correction, deletion or destruction of your personal data if the reason for data processing is no longer present while the data is processed according to the related law.
- Object to any results that might be detrimental for your when your processed data is exclusively analyzed via automated systems.
- Demand compensation for the loss if your experience any losses due to illegal personal data processing.
- The related individuals can forward their requests to the Data Supervisor under Communiqué on Application Procedures and Principles. The request of the related individual will be handled in the shortest time and a decision shall be made in at most thirty (30) days without any fee. If the assessment and decision procedure necessitates additional cost, the fee determined by the Board of Personal Data Protection tariff shall be considered. Respectfully announced to the public.