

# PERSONAL DATA PROTECTION AND PROCESSING POLICY

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## SECTION 1 – GENERAL

In our Company's Personal Data Protection and Processing Policy ("Policy"), the principles and fundamental rules adopted in carrying out personal data processing activities in compliance with the provisions of the Law on the Protection of Personal Data No. 6698 ("Law") are explained.

**Scope:** This Policy covers the personal data of all natural persons such as our employees, former employees, employee candidates, customers, suppliers, business partners, shareholders, and visitors. These data may be processed through automated or non-automated means and may form part of data recording systems.

**Validity and Updates:** The effective date of this Policy is 01.10.2018. It was updated on 15.05.2026.

This Policy has been published on the website of Ege Kimya Sanayi ve Ticaret A.Ş. at <https://www.egekimya.com.tr> for information and access.

## SECTION 2 – ISSUES REGARDING THE PROCESSING OF PERSONAL DATA

**Personal Data:** Personal data refers to any information relating to an identified or identifiable natural person. In this context, not only information such as the individual's name, surname, date of birth, and place of birth, which enable precise identification, but also information regarding the person's physical, familial, economic, social, and other characteristics are considered personal data. Identifiability means that existing data can be associated with a real person in any way, making that person identifiable.

**Special Categories of Personal Data:** Certain personal data have been given special importance under the Law due to the risk of causing victimization or discrimination if processed unlawfully, and are defined as "special categories of personal data." These include race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dress, association, foundation or trade union membership, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data.

**The following principles must be observed when processing personal data:**

- **Lawfulness and Fairness:** Our Company acts in accordance with the general principle of trust and fairness and carries out lawful processing activities.
- **Accuracy and Up-to-Date Information:** Our Company takes necessary measures to ensure that personal data remain accurate and up-to-date throughout the processing period.
- **Specified, Explicit, and Legitimate Purposes:** Our Company clearly sets out the purposes of processing personal data and processes them in connection with legitimate business purposes, informing data subjects transparently through clarification texts.
- **Relevance, Limitation, and Proportionality:** Personal data are processed only to the extent required by business activities, limited, relevant, and proportionate to the specified purposes.
- **Retention for the Period Prescribed by Law or Required for Processing Purpose:** Our Company determines whether a retention period is prescribed by law and complies with it. If no legal period exists, personal data are retained for a reasonable period necessary for the processing purpose. At the end of these periods, personal data are destroyed using methods specified in the Retention and Destruction Policy (deletion, destruction, or anonymization).

**Conditions for Processing Personal Data:** Personal data may be processed with the explicit consent of the data subject. However, in the presence of one or more of the conditions listed below, personal data may also be processed without explicit consent. The explicit consent of the data subject must relate to a specific matter, be based on informed choice, and be declared with free will. **Where any of the personal data processing conditions set out below exist, personal data may be processed without requiring the explicit consent of the data subject.**

- **Explicitly Prescribed by Law:** If the processing of personal data is explicitly stipulated by law.
- **Impossibility of Obtaining Consent:** If it is impossible to obtain consent due to factual impossibility and processing is necessary to protect the life or physical integrity of the data subject or another person.
- **Direct Relevance to Contract Formation or Performance:** If processing is necessary for the establishment or performance of a contract to which the data subject is a party.
- **Legal Obligation of the Company:** If processing is necessary for our Company to fulfill its legal obligations.
- **Public Disclosure by the Data Subject:** If the data subject has made their personal data public, processing is limited to the purpose of disclosure.
- **Necessity for Establishment, Exercise, or Protection of a Right:** If processing is necessary for the establishment, exercise, or protection of a right.
- **Legitimate Interest of the Company:** If processing is necessary for the legitimate interests of our Company, provided that it does not harm the fundamental rights and freedoms of the data subject.

**Processing of Special Categories of Personal Data:** Special categories of personal data are processed by our Company only under the conditions stipulated in Article 6 of the Law.

- Where the explicit consent of the data subject has been obtained,
- Where it is expressly provided for by law,
- Where it is necessary for the protection of the life or physical integrity of the data subject or another person, in cases where the data subject is unable to give consent due to actual impossibility or where consent is not legally valid,

- Where the personal data have been made public by the data subject, provided that the processing is consistent with the data subject's intention of disclosure,
- Where processing is necessary for the establishment, exercise, or protection of a right,
- Where processing is required by persons under a confidentiality obligation or by authorized institutions and organizations, for the purposes of protecting public health, carrying out preventive medicine, medical diagnosis, treatment and care services, and planning, managing, and financing health services,
- Where processing is necessary for the fulfillment of legal obligations in the fields of employment, occupational health and safety, social security, social services, and social assistance,
- Where processing is carried out by foundations, associations, or other non-profit organizations established for political, philosophical, religious, or trade-union purposes, in compliance with the relevant legislation and their objectives, limited to their fields of activity, and without disclosure to third parties, with respect to their current or former members, affiliates, or persons who are in regular contact with such organizations.

In addition, in accordance with Article 9 of the Law and the Regulation on the Procedures and Principles Regarding the Transfer of Personal Data Abroad, personal data may be transferred abroad if one of the conditions specified in Articles 5 and 6 of the Law is met and there is an adequacy decision regarding the country, sectors, or international organizations to which the data will be transferred.

Where no adequacy decision exists, personal data may still be transferred abroad if one of the conditions specified in Articles 5 and 6 of the Law is present, provided that the data subject can exercise his or her rights and have access to effective legal remedies in the recipient country, and that one of the appropriate safeguards set forth in Article 9(4) of the Law is ensured.

The appropriate safeguards referred to in Article 9(4) of the Law are as follows:

- The existence of an agreement, not constituting an international treaty, between public institutions or professional organizations of a public nature in Turkey and public institutions or international organizations abroad, and the authorization of the transfer by the Board.
- Compliance by companies within a group of undertakings engaged in joint economic activity with binding corporate rules containing provisions on the protection of personal data, approved by the Board.
- The existence of a standard contract published by the Board, covering matters such as categories of data, purposes of transfer, recipients and recipient groups, technical and administrative measures to be taken, and additional measures for special categories of personal data.
- The existence of a written undertaking providing adequate protection and the authorization of the transfer by the Board.

Due to the fact that the servers of the Microsoft applications used within our Company are located abroad, personal data are transferred abroad with the provision of appropriate safeguards and the implementation of necessary technical and administrative measures.

**Parties to Whom Data Are Transferred:** For the purpose of ensuring the conduct of commercial and operational activities, personal data may be transferred to affiliates, group companies; suppliers, customers, and business partners with whom there is a commercial relationship; legally authorized public institutions and organizations; and legally authorized private persons and entities, under the conditions specified above.

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Our Company has certain obligations under the Law to ensure the effective protection of personal data.

The main obligations can be summarized as follows:

- Obligation to inform and, where necessary, to obtain explicit consent
- Obligations relating to data security
- Obligation to register with VERBIS and to create a data inventory
- Obligation to respond to applications made by data subjects
- Obligation to comply with the decisions of the Board
- Obligation to establish a data retention and destruction policy

### SECTION 3 – PROCESSED PERSONAL DATA

The categories of personal data processed within our Company are as follows:

- **Identity** (such as name, surname, parents' names, date of birth, place of birth, Turkish ID number)
- **Contact** (such as address, email address, communication address, phone number)
- **Personnel** (such as payroll information, disciplinary investigation records, employment entry/exit documents, CV information, performance evaluation reports)
- **Legal Transaction** (such as information in correspondence with judicial authorities, information in case files)
- **Customer Transaction** (such as invoice, promissory note, check information, order details, request information)
- **Physical Space Security** (such as entry-exit records of employees and visitors, CCTV recordings)
- **Transaction Security** (such as IP address information, password and login credentials)
- **Finance** (such as balance sheet information, financial performance data, credit and risk information)
- **Professional Experience** (such as diploma details, attended courses, in-service training information, certificates, transcripts)
- **Visual and Audio Records** (such as photographs, video, and audio recordings)
- **Trade Union Membership** (such as information on union membership)
- **Health Information** (such as disability status, blood type, personal health details)
- **Criminal Convictions and Security Measures** (such as information on criminal records and security-related measures)
- **Family Members and Relatives Information**

#### **Groups of Data Subjects whose personal data are processed within our Company:**

- Employee Candidate
- Employee
- Shareholder/Partner
- Board Member
- Supplier Employee
- Supplier Representative
- Customer/Service Recipient
- Visitor
- Subcontractor Employee
- Third Party related to Legal Case

## SECTION 4 – RIGHTS OF DATA SUBJECTS AND EXERCISE OF THESE RIGHTS

The data subject is defined as the real person whose personal data are processed. The data subject has the following rights against our Company:

- To learn whether personal data are being processed,
- To request information if personal data have been processed,
- To learn the purpose of processing personal data and whether they are used in accordance with that purpose,
- To know the third parties to whom personal data are transferred domestically or abroad,
- To request correction if personal data are incomplete or incorrectly processed, and to request notification of such correction to third parties to whom the data have been transferred,
- To request deletion or destruction of personal data if the reasons requiring processing no longer exist, and to request notification of such deletion or destruction to third parties to whom the data have been transferred,
- To object to the emergence of a result against the person by analyzing processed data exclusively through automated systems,
- To request compensation if personal data are processed unlawfully and cause damage.

**Exercising Rights:** Data subjects may submit their requests regarding their rights through the methods specified in the Application Form available on our Company’s website.

**Company’s Response to Applications:** If the data subject duly submits their request to our Company, the request will be concluded free of charge as soon as possible and within no more than 30 (thirty) days, depending on the nature of the request. However, if the process requires an additional cost, a fee may be charged according to the tariff determined by the Personal Data Protection Board.

## SECTION 5 – SPECIAL CASES OF PERSONAL DATA PROCESSING

Detailed studies have been carried out in all departments of our Company regarding which categories of personal data are processed, for what purposes, based on which legal grounds, and within which processes. As a result of these studies, the responsibilities of relevant units have been clarified, necessary administrative and technical security measures have been identified and implemented, and all legal obligations arising from personal data protection legislation have been structured into applicable procedures on a departmental basis.

In addition to personal data processing activities within the Company, certain activities specific to visitors are also carried out. For security purposes, our buildings and facilities are monitored by closed-circuit camera systems. Data subjects are informed about this monitoring activity through clarification texts. Access to camera recordings stored digitally is restricted to a limited number of Company employees.

When connecting to the “Ege Guest” wireless network in our Company building, internet access is provided via a code sent to the user’s mobile phone number. In compliance with legal obligations, log records may be stored when connecting to this network.

Visitor entry and exit records are also processed for security purposes. Names and surnames of visitors entering our buildings are collected, and data subjects are informed through posted or otherwise accessible texts.

Furthermore, within the Company, both in the Human Resources department and in all operational and support units, obligations regarding data subject information are fulfilled completely and on time. Data processing activities are evaluated according to legal grounds, explicit consent is obtained where necessary, safeguards for data transfers are established in compliance with legislation, and technical and administrative measures for data security are continuously updated and implemented. These practices have become an integral part of the Company's corporate culture.

In this context, awareness is raised among all employees, responsibilities of process owners are clarified, policies and procedures are regularly reviewed, and internal audit and control mechanisms are operated. These practices form the foundation of a sustainable compliance structure.

Our Company regards full compliance with personal data protection legislation not only as a legal obligation but also as an indispensable element of corporate reputation, ethical management, and a trust-based working culture.

### **SECTION 6 – PROTECTION OF PERSONAL DATA**

- **Policy Development:** Our Company has integrated compliance into corporate governance through policies and procedures created in accordance with personal data protection legislation. Data subjects are informed via clarification texts during personal data processing. In the Human Resources Department, data subjects are categorized, and compliance efforts are carried out accordingly. Policies and procedures are reviewed and updated periodically.
- **Organizational Structure and Responsibilities:** A Personal Data Protection Committee has been established, responsible for personal data security. Personal data processing activities have been clarified for all departments, and a personal data inventory has been prepared.
- **Training and Awareness:** All employees receive training on personal data protection, obligations under the Law, and Company policies. Regular awareness activities are conducted to maintain employee attention and ensure ongoing vigilance.
- **Data Security Measures:** In accordance with Article 12 of the Law, our Company takes necessary administrative and technical measures to prevent unlawful processing and access to personal data, and to ensure secure storage. These measures are continuously updated in line with guidelines published by the Authority. Unauthorized access to areas containing personal data is prevented; visitor records are kept, and security cameras are used. Physical files are stored in locked cabinets, and the Company has adopted “clean desk” and “screen privacy” principles. Access rights in information systems are defined on a role-based basis, and each employee can only access the minimum data necessary for their work.

- **Retention and Destruction:** Retention periods for each data category have been determined, along with destruction processes in compliance with these periods. A Retention and Destruction Policy has been prepared to manage this process.
- **Breach Management and Application Processes:** A “Data Breach Response Plan” has been established to act in case of suspected personal data breaches. Data subjects may submit applications and rights requests to our Company through the Application Form available on our website.
- **Audit, Monitoring, and Continuous Improvement:** Personal data processing activities and implemented measures are regularly monitored. Legislative changes, guidelines, and Board decisions are followed, and Company policies and processes are updated when necessary.