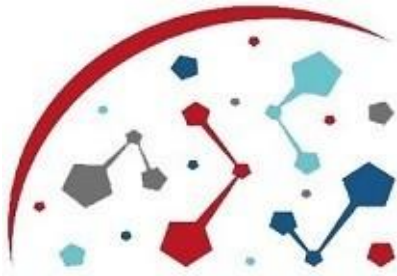


1.1.2020



**KVKIK**

PROTECTION OF PERSONAL DATA AND

# PROCESSING POLICY

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# Personal Data Protection and Processing Policy

## 1. ENTE

### R S

As the data controller, it is of great importance for **FİSTAŞ Fantezi İplik San. Ve Tic A.Ş** ("**FİSTAŞ**" or "**Company**") as the data controller, the protection of personal data of its customers, employees and other real persons with whom it has a relationship is of great importance. For the processing and protection of personal data, the process managed by this Policy and other written policies within **FİSTAŞ** and the targeted goal is to process and protect the personal data of our customers, potential customers, employees, employee candidates, visitors, employees of the institution we cooperate with, employees of the **FİSTAŞ** group of companies we are involved in and third parties in accordance with the law.

In this context, **FİSTAŞ** for the processing and protection of personal data in accordance with Law No. 6698 and the relevant legislation

The necessary administrative and technical measures are taken by the Ministry of Defence.

In this Policy, the following basic principles adopted by **FİSTAŞ** for the processing of personal data will be explained:

- o Processing of personal data within the scope of consent,
- o Processing of personal data in accordance with the law and good faith,
- o Keeping personal data accurate and up-to-date when necessary,
- o Processing personal data for specific, explicit and legitimate purposes,
- o Processing personal data in connection with the purpose for which they are processed, limited and measured,
- o Keeping personal data for the period stipulated in the relevant legislation or required for the purpose for which they are processed,
- o Enlightening and informing personal data subjects,
- o Creating the necessary infrastructure for personal data owners to exercise their rights,
- o Taking necessary measures for the protection of personal data,
- o To act in accordance with the relevant legislation and the regulations of the PDP Board in determining and implementing the purposes of processing personal data and transferring them to third parties,
- o Specific regulation of the processing and protection of special categories of personal data

## 2. PURPOSE OF THE POLICY

The main purpose of this Policy is to make explanations about the personal data processing activities carried out by **FİSTAŞ** in accordance with the law and the systems adopted for the protection of personal data, and in this context, to provide transparency by informing our customers, employees, employee candidates, visitors, shareholders and employees of the institutions we cooperate with and third parties.

## 3. SCOPE OF THE POLICY

This Policy relates to all personal data of our customers, employees, employee candidates, visitors, employees of the institutions we cooperate with and third parties, which are processed automatically or non-automatically provided that they are part of any data recording system.

Data subjects whose personal data are processed within the scope of this Policy are categorised as follows.

<b>Employee Candidate</b>	By applying for a job with the Company or by any other means, you can submit your CV and relevant natural persons who make their information accessible to the Company
<b>Employee</b>	Persons whose business relationship with the Company continues
<b>Former Employee</b>	Former employees whose employment relationship with the company has ended
<b>Visitors</b>	Those who have entered the physical facilities of the Company for various purposes or have used the websites natural persons visiting

<b>Trainee Candidate</b>	By applying to the Company for an internship or by any other means natural persons who make their CV and related information available to the Company
<b>Intern</b>	Persons whose internship relationship with the company continues
<b>Product or Service Recipient Person</b>	Purchasing products/services from the Company and obtaining personal data for this purpose the person who is
<b>Supplier Authorised</b>	Real person sole proprietorships or legal entities to which the Company supplies products/services authorised signatories
<b>Supplier Employee</b>	Persons working in the suppliers from whom the Company supplies products/services
<b>Potential Product or Service Recipient</b>	Persons who are potential customers of the Company, prospective customers
<b>Shareholder/Partner</b>	Company shareholders
<b>Customer Officer</b>	Real person sole proprietorships or legal entities to which the Company sells products/services persons who are authorised signatories
<b>Client Employee</b>	Persons working for customers to whom the Company sells products/services
<b>Counsellor</b>	Outsourced services in line with the Company's objectives, projects and expectations persons / organisations (academics etc.)
<b>Subcontractor Employee</b>	Persons working in companies that are subcontractors of the Company
<b>Discoverer-Ciranta</b>	Real persons whose cheque information is processed in the financial-accounting processes of the Company
<b>Third Parties</b>	Including but not limited to guarantors, family members, etc. whose personal data are processed within the framework of this Policy, although not defined in the Policy other natural persons

#### 4. EFFECTIVE DATE OF THE POLICY

This Policy issued by **FİSTAŞ** was put into effect on 01.01.2020. This Policy is published on **FİSTAŞ**'s website ([www.fistas.com](http://www.fistas.com)) and made available to the relevant persons upon the request of personal data owners. **FİSTAŞ** may revise the policy when deemed necessary. In case of revision, the most up-to-date version of the Policy is published on the Company's website.

#### 5. ISSUES REGARDING THE PROTECTION OF PERSONAL DATA

In accordance with Article 12 of the KVK Law, **FİSTAŞ** takes the necessary technical and administrative measures to ensure the appropriate level of security in order to prevent unlawful processing of personal data, unlawful access to data and to ensure the preservation of data, and conducts or has the necessary audits carried out within this scope.

##### 5.1. Measures Taken to Ensure Lawful Processing of Personal Data

**FİSTAŞ** takes technical and administrative measures according to technological possibilities and implementation costs in order to ensure that personal data is processed in accordance with the law.

##### 5.1.1. Technical Measures

**FİSTAŞ** takes technical measures to ensure that personal data is processed in accordance with the law and is monitored through internal audits.

##### 5.1.2. Administrative Measures

Administrative measures taken by **FİSTAŞ** for the lawful processing of personal data:

**FİSTAŞ** employees are informed and trained on the law on the protection of personal data and the processing of personal data in accordance with the law.

All personal data processing activities carried out by **FİSTAŞ** are carried out in accordance with the personal data inventory and annexes created by analysing all business units in detail.

The personal data processing activities carried out by the relevant departments within **FİSTAŞ**; the obligations to be fulfilled in order to ensure that these activities comply with the personal data processing conditions sought

by the KVKK have been linked to written policies and procedures by **FİSTAŞ**, and each business unit has been informed about this issue and the issues to be considered specific to the activity it carries out have been determined.

The supervision and management of the departments within **FİSTAŞ** regarding personal data security is organised by the FINANCIAL AFFAIRS MANAGER. Awareness is created to ensure the legal requirements determined on the basis of the business unit, and the necessary administrative measures to ensure the supervision of these issues and the continuity of the implementation are implemented through internal policies, procedures and trainings.

In the service contracts and related documents between **FİSTAŞ** and employees, records containing information about personal data and data security are included and additional protocols are made. Efforts have been made to create the necessary awareness for employees on this issue.

**FİSTAŞ** conducts KVKK Risk Analysis in the following cases:

- In new projects involving personal data
- Before the selection of the supplier to whom personal data is transferred
- Before the activities to be carried out within the scope of marketing activities
- In case of any change in the above-mentioned activities
- KVKK Risk Analysis is subject to the approval of the Financial Affairs Manager.

#### 5.1.3. Technical and Administrative Measures Taken to Prevent Unlawful Access to Personal Data

**FİSTAŞ** takes technical and administrative measures according to the class, nature, technological possibilities and implementation cost of the data to be protected in order to prevent disclosure, access, transfer of personal data by imprudent or unauthorised persons, data leaks in **FİSTAŞ** systems or all other forms of unlawful access.

#### 5.1.4. Technical Measures

The main technical measures taken by **FİSTAŞ** to prevent unlawful access to personal data are listed below:

New technological developments are followed and technical measures are taken on the systems, especially in the field of cyber security, and the measures taken are periodically updated and renewed.

Access and authorisation technical solutions are put into use within the framework of legal compliance requirements determined for each department within **FİSTAŞ**.

Access authorisations are restricted and authorisations are regularly reviewed. Access restrictions are applied to former employees and accounts are closed.

The technical measures taken in accordance with the internal operation of **FİSTAŞ** are reported to the relevant users, the issues that pose a risk are re-evaluated and the necessary technological solution is produced.

Software and hardware including virus protection systems, data vulnerability security and firewalls are installed.

Specialised personnel are employed in technical matters.

All information systems, including applications where personal data are collected, are regularly subjected to external impact testing to identify security vulnerabilities and the vulnerabilities found according to the results of this test are closed.

#### 5.1.5. Administrative Measures

Employees, especially the relevant users who process personal data and all personnel are trained on the administrative measures to be taken to prevent unlawful access to personal data.

Legal compliance, access to personal data within the company and authorisation processes are implemented in each department within **FİSTAŞ**, taking into account the personal data processing processes.

In the contracts signed between **FİSTAŞ** and employees, the scope of lawful personal data processing activity is explained and there are commitments to act in accordance with these issues.

**FİSTAŞ** enters into an additional agreement with the persons to whom personal data are transferred in accordance with the law, which includes provisions that the persons to whom personal data are transferred will take the necessary security measures to protect personal data and ensure that these measures are complied with in their own organisations.

#### 5.2. Supervision of Measures Taken for the Protection of Personal Data

Pursuant to its duty arising from Article 12 of the Law, **FİSTAŞ**, in order to ensure the implementation of the provisions of the Law in its own institution or organisation, conducts the necessary audits personally by **the FINANCIAL AFFAIRS MANAGER** and, if necessary, by receiving support from competent institutions. According to the results of these audits, the violations, negativities and nonconformities detected, the necessary measures are taken in respect of these issues.

to store personal data. In the event that an external service is received by FİSTAŞ due to technical requirements for the storage of personal data, additional agreements are made with the relevant companies to which personal data are transferred in accordance with the law, including provisions that the persons to whom personal data are transferred will take the necessary security measures to protect personal data and ensure that these measures are complied with in their own organisations.

## **6. RIGHTS OF THE PERSONAL DATA OWNER AND REQUESTS**

In accordance with Article 13 of the KVK Law, **FİSTAŞ**, as the data controller against the requests of the data subject, has established the Personal Data Application and Response Procedure, which is an annex to the personal data inventory, and the procedures for directing to the written template for applications that do not meet the application conditions specified in the law. Technical preparations have been made in order to carry out the necessary procedures in accordance with these procedures. There is a systematic infrastructure within **FİSTAŞ** to ensure the implementation of this procedure.

In the event that personal data owners submit their requests regarding their rights listed below to **FİSTAŞ in writing** through a notary public, by personal application with the presentation of identity card, or by using the registered electronic mail (KEP) address, secure electronic signature, mobile signature or the electronic mail address previously notified to FİSTAŞ by the relevant person and registered in FİSTAŞ's system, or by using a software or application developed for the purpose of application, **FİSTAŞ** will respond to the request free of charge within thirty days at the latest, depending on the nature of the request. A detailed explanation on this matter is provided below in Article 20 of this policy.

Personal data owners will be able to request all rights in the relevant article of the law, including all processing processes, purposes and transfer information of their personal data, with the application they will make in accordance with this procedure.

## **7. PROTECTION OF SPECIAL CATEGORIES OF PERSONAL DATA**

The PDP Law attributes special importance to certain personal data due to the risk of causing victimisation or discrimination when processed unlawfully. These data are; race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, association, foundation or trade union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data.

**FİSTAŞ** acts sensitively in the protection of special quality personal data, which is determined as "special quality" by the KVK Law and processed in accordance with the law. In this context, technical and administrative measures taken by **FİSTAŞ** for the protection of personal data are carefully implemented in terms of special quality personal data and necessary audits are provided within **FİSTAŞ**.

In this context, **FİSTAŞ** processes the health data of its employees due to the workplace medicine service it receives as an outsourced service, and the necessary trainings are provided to the personnel who can access this special quality personal data, the scope and duration of the access authorisation of these personnel are determined, periodic audits are carried out and confidentiality agreements are signed. In case the relevant personnel leaves the job, the access authorisation is immediately removed.

Physical files containing personal health data stored physically in the health files of employees are kept in locked areas accessible only by infirmary personnel. No unit other than the infirmary staff can access the health data of the employees.

## **8. TRAININGS ON THE PROTECTION AND PROCESSING OF PERSONAL DATA OF FİSTAŞ EMPLOYEES**

**FİSTAŞ** ensures that the necessary trainings are organised for its employees in order to raise awareness to prevent unlawful processing of personal data, unlawful access to data and to ensure the protection of data.

## **9. ISSUES REGARDING THE PROCESSING OF PERSONAL DATA**

FİSTAŞ, in accordance with Article 20 of the Constitution and Article 4 of the KVK Law, regarding the processing of personal data;

- in accordance with the law and good faith,
- accurate and, where necessary, up to date,
- pursuing specific, explicit and legitimate purposes, purpose-related,
- personal data processing

activities in a limited and measured manner.



**FİSTAŞ** retains personal data for the period stipulated by law or required by the purpose of personal data processing. Personal data belonging to **FİSTAŞ**, its customers, employees, visitors, supplier company employees and third parties; personal data such as identity information (name, surname, Turkish ID number, gender, age, date of birth), contact information (e-mail address, telephone number address information, IP address), vehicle specifications, registration information, chassis information, usage habits regarding all kinds of products, preferences, tastes and user habits on the vehicle, occupational data, visual and auditory data, educational data, family members data, health data, The personal data listed herein are processed within the framework of the performance of contracts, fulfilment of work and financial/legal/commercial obligations, as well as the performance of contracts, fulfilment of work and financial/legal/commercial obligations, in order for the owners of personal data to benefit from **FİSTAŞ** goods and services effectively, to improve product and service diversity and to provide technological development and innovation with data features in vehicles, to provide the best service to its customers and to be informed about marketing, promotions and innovations as a result of these services.

**FİSTAŞ** enlightens the data subjects in accordance with Article 10 of the KVK Law and requests the consent of the data subjects in cases where consent is required, and processes this personal data based on the following criteria.

#### 9.1. Processing in accordance with the Law and Good Faith

**FİSTAŞ** acts in accordance with the principles introduced by legal regulations and the general rule of trust and honesty in the processing of personal data. In accordance with the principle of compliance with the rule of honesty, **FİSTAŞ** takes into account the interests and reasonable expectations of the relevant persons while trying to achieve its objectives in data processing.

#### 9.2. Ensuring that Personal Data is Accurate and Up-to-Date When Necessary

Keeping personal data accurate and up-to-date is necessary for **FİSTAŞ** to protect the fundamental rights and freedoms of the person concerned. **FİSTAŞ** has an active duty of care to ensure that personal data is accurate and up-to-date when necessary. For this reason, all communication channels are open for **FİSTAŞ** to keep the information of the data subject accurate and up-to-date.

#### 9.3. Processing for Specific, Explicit and Legitimate Purposes

**FİSTAŞ** clearly and precisely determines the legitimate and lawful purpose of personal data processing. **FİSTAŞ** processes personal data in connection with and necessary for the commercial activity it carries out.

#### 9.4. Being relevant, limited and proportionate to the purpose for which they are processed

**FİSTAŞ** processes personal data within the scope of the purposes related to its field of activity and necessary for the execution of its business. For this reason, **FİSTAŞ** processes personal data in a manner suitable for the realisation of the specified purposes and avoids the processing of personal data that is not related to the realisation of the purpose or is not needed. For example, personal data processing activities are not carried out to meet the needs that may arise later.

#### 9.5. Preservation for the Period Stipulated in the Relevant Legislation or Required for the Purpose for which they are Processed

**FİSTAŞ** retains personal data only for the period specified in the relevant legislation or for the period required for the purpose for which they are processed. In this context; **FİSTAŞ** first determines whether a period of time is stipulated for the storage of personal data in the relevant legislation, if a period is determined, it acts in accordance with this period, and if a period is not determined, it keeps personal data for the period required for the purpose for which they are processed. **FİSTAŞ** takes the retention periods in the personal data inventory as a basis, and at the end of the periods specified herein, personal data are deleted, destroyed or anonymised according to the nature and intended use of the data within the framework of the obligations under the Law.

### 10. PROCESSING OF DATA COLLECTED BY SUPPLIERS AND SERVICE PROVIDERS BY **FİSTAŞ**

Within the scope of its activities, **FİSTAŞ** enters into a contractual relationship with suppliers and companies in the service sector and carries out its services through these persons. In this context, personal data from **FİSTAŞ** suppliers and service companies are obtained by fulfilling the obligation to inform and obtaining consent from the persons and transferred to **FİSTAŞ**. These data may be processed by **FİSTAŞ** in order to carry out the work. In the event that the personal data sharing relationship between **FİSTAŞ** and its suppliers and service providers takes place in the form of personal data transfer from the data processor to the data controller within the scope of the KVK Law, during the personal data collection phase of the relevant person, the person is informed that this personal data may be sent to **FİSTAŞ**.

## 11. CLARIFICATION AND INFORMATION OF THE PERSONAL DATA SUBJECT

**FİSTAŞ** enlightens personal data owners during the acquisition of personal data in accordance with Article 10 of the KVK Law. In this context, **FİSTAŞ** informs the personal data owner about the purpose for which personal data will be processed, to whom and for what purpose the processed personal data can be transferred, the method and legal reason for collecting personal data and the rights of the personal data owner according to the nature of the data owner and the data processing process. In this context, Clarification Texts have been placed in areas that customers can easily see in their factories. Clarification text, cookie policy and application form are also published on **FİSTAŞ** websites together with this policy.

## 12. TRANSFER OF PERSONAL DATA TO

**FİSTAŞ** may transfer the personal data and sensitive personal data of the personal data owner to third parties by taking the necessary security measures in line with the lawful personal data processing purposes. Reasons for transfer are explained below:

- If there is a clear regulation in the laws regarding the transfer of personal data,
- If it is necessary to transfer the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract,
- If personal data transfer is mandatory for **FİSTAŞ** to fulfil its legal obligation,
- If personal data transfer is mandatory for the establishment, exercise or protection of a right,
- If personal data transfer is mandatory for the legitimate interests of **FİSTAŞ**, provided that it does not harm the fundamental rights and freedoms of the personal data owner.

## 13. FİSTAŞ PERSONAL DATA INVENTORY AND CLASSIFICATION OF PERSONAL DATA

In **FİSTAŞ**, in line with the legitimate and lawful personal data processing purposes of **FİSTAŞ**, in accordance with the KVK Law

5. Based on and limited to one or more of the personal data processing conditions specified in Article 5, personal data in the following categories, limited to the personal data owners (Customers, employees, visitors, third parties, employee candidates, employee candidates, employees of the institutions we cooperate with) within the scope of this Policy and by complying with the general principles specified in the KVK Law and all obligations regulated in the KVK Law, especially the principles specified in Article 4 regarding the processing of personal data, are processed by informing the relevant persons.

**FİSTAŞ** has created a personal data inventory in accordance with the Regulation on Data Controllers Registry issued by the Personal Data Protection Authority. This data inventory includes data categories, data source, data processing purposes, data processing process, recipient groups to which data are transferred and retention periods. In this context, **FİSTAŞ** personal data inventory includes, but is not limited to, the following types of data categories.

<b>PERSONAL DATA CATEGORISATION</b>	<b>PERSONAL DATA CATEGORISATION DESCRIPTION</b>
Contact Data	It is the data group that can be used to reach the person (telephone, address, e-mail, fax number, IP address).
Identity Data	It is the data group containing information about the identity of the person (Name, surname, TRKN, mother's name, father's name, place of birth, date of birth, gender, wallet serial number, ID card photocopy, tax number, social security number, nationality data, marriage certificate photocopy/scan, employee card).
Health Data	It is the data group containing the health information of the person (blood group, medical history, check-up result, consultation report, diet form).
Audiovisual Data	It is the data group containing visual and auditory data of the person (photograph, voice recording, camera recording, photocopy/scan of driving licence, photocopy/scan of ID card, photocopy/scan of passport).
Digital Trace Data	A data group containing digital traces resulting from the processing of personal information (Log).
Financial Data	It is the data group containing the financial information of the person (Bank account number, ibanno, card information, bank name, financial profile, mail order form, credit rating).

Occupational Data	It is the data group containing information about the occupation of the person (information about the organisation he/she works for, professional chamber registration).
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Education Data	It is the data group containing the education data of the person (diploma grade, diploma photocopy/scan).
Travel Data	It is the data group containing information about the person's travels (flight information, flight card, tour route, mile card number, accommodation data).
Company Data	Data for a sole proprietorship (company address).
Race/Religion	A data group containing data on a person's origin and beliefs (race/religion data).
Association membership information	It is the data group containing the information of the association that the person is a member and related to (All association memberships).
Signature Data	It is the data group containing the signature information of the person (wet signature, e-signature, signature photocopy/scan).
Visa/Passport Data	Data group containing visa/passport information of the person (visa information, passport photocopy/scan).
Sanction Data	It is a data group related to the sanctions the person has received in the past (Criminal Prosecutions, Criminal Record, Disciplinary Record).

**FİSTAŞ**, within the scope of data processing activities and based on the types of data used within the company **FİSTAŞ** has determined the retention periods in the Personal Data Inventory with justifications.

#### 14. PURPOSES OF PROCESSING PERSONAL DATA

**FİSTAŞ** processes personal data limited to the purposes and conditions within the personal data processing conditions specified in paragraph 2 of Article 5 and paragraph 3 of Article 6 of the KVK Law. These purposes and conditions are as follows:

- Sale of product goods,
- Performance of after-sales services,
- Performing collection transactions including mail order and transfer instructions,
- Providing customers with various advantages through product-service promotion, information, personalised advertising, campaigns and other benefits, sending commercial electronic messages within the framework of loyalty programmes, survey and telesales applications, statistical analyses,
- Carrying out studies to improve service quality and providing better service,
- Invoice issuance for our services,
- Procurement of services from external sources,
- Providing customers with the benefits of specialised organisations in order to receive services in areas that are not in their own field of expertise and to receive technology services,
- Identity confirmation,
- Responding to questions and complaints,
- Taking necessary technical and administrative measures within the scope of data security,
- Financial reconciliation with relevant business partners and other third parties regarding the products and services offered,
- Providing the necessary information in line with the requests and audits of regulatory and supervisory institutions and official authorities,
- Maintaining the information regarding the data that must be kept in accordance with the relevant legislation,
- Ensuring the audit of the consistency of information,
- Measuring customer satisfaction,
- In terms of employees; the creation of a personal file, determination of whether they are capable of fulfilling the requirements of the job continuously, private health insurance, creation of a health file, taking occupational safety measures,
- Use of the data received through the website or social media channels for marketing purposes through 3rd party agencies,
- Fulfilment of legal obligations,
- Execution/follow-up of **FİSTAŞ** financial reporting and risk management transactions,
- Execution/follow-up of **FİSTAŞ** legal affairs,
- Creation and follow-up of visitor records

## 15. STORAGE PERIODS OF PERSONAL DATA

In case it is stipulated in the relevant laws and regulations, FİSTAŞ retains personal data for the period specified in these regulations.

If a period of time is not regulated in the legislation regarding how long personal data should be stored, personal data is stored for the period required to be stored in accordance with the practices of FİSTAŞ and the customs of the sector, depending on the activity carried out by **FİSTAŞ** while processing that data, and then deleted, destroyed or anonymised in accordance with the relevant policy established by **FİSTAŞ** in accordance with the nature of the data.

If the purpose of processing personal data has expired and the retention periods determined by the relevant legislation and FİSTAŞ have expired, personal data can only be stored in order to constitute evidence in possible legal disputes or to assert the relevant right related to personal data or to establish defence. In the establishment of the periods here, the retention periods are determined based on the statute of limitations for the assertion of the aforementioned right and the examples in the requests previously addressed to FİSTAŞ on the same issues despite the expiration of the statute of limitations. In this case, the stored personal data are not accessed for any other purpose and access to the relevant personal data is provided only when it is required to be used in the relevant legal dispute. After the aforementioned period expires, personal data are deleted, destroyed or anonymised.

## 16. THIRD PARTIES TO WHOM PERSONAL DATA ARE TRANSFERRED BY FİSTAŞ AND THE PURPOSES OF TRANSFER

In accordance with Article 10 of the KVK Law, FİSTAŞ informs the personal data owner about the groups of persons to whom personal data are transferred.

In accordance with Articles 8 and 9 of the KVK Law, FİSTAŞ may transfer the personal data of the data owners governed by this Policy to the stakeholder categories listed below:

- To **FİSTAS** business partners,
- Banks and insurance companies
- Common Health and Safety Units
- Travel agencies
- Institutions and organisations providing health services to employees
- Hotels
- Education companies
- **FİSTAS** suppliers,
- **FİSTAS** group companies
- **FİSTAS** company officials,
- Legally authorised public institutions and organisations,

The scope of transfer and data transfer purposes are stated below:

<i><b>Persons to whom data can be transferred</b></i>	<i><b>Definition</b></i>	<i><b>Data Transfer Purpose</b></i>
Business Partner	It defines the parties with which <b>FİSTAŞ</b> has established business partnerships for purposes such as carrying out various projects and receiving services while carrying out its commercial activities.	To ensure that the objectives of the establishment of the business partnership are fulfilled limited to the purpose for which it is intended.
Supplier	It defines the parties that provide services to <b>FİSTAŞ</b> on a contractual basis in accordance with the orders and instructions of <b>FİSTAŞ</b> while conducting FİSTAŞ's commercial activities.	In order to ensure that <b>FİSTAŞ provides the</b> services that <b>FİSTAŞ</b> outsources from the supplier and that are necessary for <b>FİSTAŞ</b> to fulfil its commercial activities limited.
Group Companies	<b>FİSTAŞ</b> defines group companies.	The necessary data are transferred between the companies of <b>FİSTAS</b> group companies.
Authorised Public Institutions and	Defines the public institutions and organisations authorised to obtain information and documents from <b>FİSTAŞ</b>	It is transferred limited to the purpose when requested by public institutions and organisations and when they provide a legal

Organisations	according to the provisions of the legislation.	basis.
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## 17. PROCESSING OF PERSONAL DATA

### 17.1. Processing of Personal Data

The explicit consent of the personal data subject is only one of the legal grounds that make it possible to process personal data in accordance with the law. Apart from explicit consent, personal data may also be processed in the presence of one of the conditions specified in the law. The basis of the personal data processing activity may be only one of the following conditions, or more than one of these conditions may be the basis of the same personal data processing activity.

<i><b>Terms of Processing</b></i>	<i><b>Scope</b></i>	<i><b>Example</b></i>
Legislative Provision	Tax Legislation, Labour Legislation, Trade Legislation etc.	Personal information of the employee must be kept in accordance with the legislation.
Performance of Contract	Contract of Employment, Contract of Sale, Contract of Carriage, Contract of Labour etc.	The company is required to make deliveries saving of address information.
Actual Impossibility	A person who is unable to give consent due to actual impossibility or who lacks the power of discernment.	Contact or address information of an unconscious person. Location of an abducted person.
Legal Liability of the Data Controller	Financial Audits, Security Legislation, Harmonisation with Sector Focused Regulations.	Information in audits specific to areas such as Banking, Energy, Capital Markets sharing of information.
Publicising	The person concerned makes information about himself/herself publicly available.	The person publishes his/her contact details so that he/she can be contacted in case of emergency.
Establishment, Protection of Right, Utilisation	Compulsory to be used for filing lawsuits, registration procedures, all kinds of title deed transactions, etc. data.	The necessary information of a dismissed employee during the statute of limitations storage.
Legitimate Interest	If it is mandatory for the legitimate interest of the data controller, provided that the fundamental rights of the data subject are not harmed data can be processed.	Data processing for the purpose of implementing rewards and bonuses that increase employee loyalty.

## 18. FİSTAŞ ENTRANCES IN ITS BUILDINGS, FACTORIES AND PHYSICAL PREMISES AND PERSONAL DATA PROCESSING ACTIVITIES CARRIED OUT WITHIN THESE AREAS

In order to ensure security, **FİSTAŞ** carries out personal data processing activities for the monitoring of guest entrances and exits with security cameras in **FİSTAŞ** buildings, factories and physical premises.

FİSTAŞ carries out personal data processing activities by using security cameras and recording guest entrances and exits.

**FİSTAŞ**, within the scope of security camera surveillance activity; It aims to protect the interests of the company and other persons to ensure the security of the company and other persons. This monitoring activity is carried out in accordance with the KVKK and the Law on Private Security Services and the relevant legislation. In this context, the information that camera surveillance is carried out is announced to all employees and visitors and people are enlightened. Notification letters are posted at the entrances of the monitored areas. In accordance with Article 12 of the KVK Law, necessary technical and administrative measures are taken by FİSTAŞ to ensure the security of personal data obtained as a result of camera surveillance.

### 18.1. Monitoring of Guest Entry and Exit at the Entrances and Inside of **FİSTAŞ** Buildings, Factories and Physical Settlements

For the purpose of ensuring security and for other purposes specified in this Policy, **FİSTAŞ** carries out personal data processing activities for the tracking of guest entrances and exits in **FİSTAŞ** buildings, factories and physical premises. While the identity data of the persons who come to **FİSTAŞ** buildings as guests are obtained or through the texts posted at **FİSTAŞ** or otherwise made available to the guests, the personal data owners in question are enlightened within this scope. The data obtained for the purpose of tracking guest entry-exit are processed only for this purpose and the relevant personal data are physically recorded in the data recording

system.

18.2. Keeping Records Regarding Internet Access Provided to Visitors in **FİSTAŞ** Buildings, Factories and Physical Premises



For the purpose of ensuring security by FİSTAŞ and for other purposes specified in this Policy, internet access can be provided to visitors who request it during their stay in the building, factory and physical premises. In this case, log records regarding internet access are kept in accordance with the Law No. 5651 and the mandatory provisions of the legislation regulated in accordance with this Law, and these records are processed only if requested by the competent public institutions and organisations or in order to fulfil the relevant legal obligation in the audit processes to be carried out within FİSTAŞ.

## **19. TERMS OF DESTRUCTION (DELETION, DESTRUCTION AND ANONYMISATION) OF PERSONAL DATA**

Pursuant to Article 138 of the Turkish Penal Code, Article 7 of the KVK Law and the "Regulation on Deletion, Destruction and Anonymisation of Personal Data" issued by the Board, personal data shall be deleted, destroyed or anonymised based on FİSTAŞ's own decision or upon the request of the personal data owner in the event that the reasons requiring its processing disappear, although it has been processed in accordance with the provisions of the relevant law. FİSTAŞ has established a procedure in this regard in accordance with the provisions of the regulation and destroys it according to the nature of the data in accordance with this policy. In accordance with this regulation, periodic destruction dates have been determined by FİSTAŞ and a calendar has been created according to which periodic destruction will be carried out at various intervals with the commencement of the obligation.

## **20. RIGHTS OF PERSONAL DATA OWNERS; EXERCISING THESE RIGHTS**

FİSTAŞ informs the personal data owner of the rights of the personal data owner in accordance with Article 10 of the KVK Law and guides the personal data owner on how to use these rights regulated in Article 11. FİSTAŞ carries out the necessary channels, internal functioning, administrative and technical arrangements in accordance with Article 13 of the KVK Law in order to evaluate the rights of personal data owners and to provide the necessary information to personal data owners.

### **20.1. Rights of the Data Subject and Exercise of These Rights**

#### **20.1.1. Rights of the Personal Data Owner**

Personal data subjects have the following rights:

- a. To learn whether personal data is being processed,
- b. Request information if personal data has been processed,
- c. To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- d. To know the third parties to whom personal data are transferred domestically or abroad,
- e. To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- f. Although it has been processed in accordance with the provisions of the KVK Law and other relevant laws, to request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- g. In the event that a result to the detriment of the person himself/herself arises by analysing the processed data exclusively through automated systems, to object to this result,
- h. In case of damage due to unlawful processing of personal data, to demand compensation for the damage.

#### **20.1.2. Cases where the Personal Data Owner cannot assert his/her rights**

Pursuant to Article 28 of the KVK Law, personal data owners cannot assert their rights listed in 20.1.1. in these matters, since the following cases are excluded from the scope of the KVK Law:

- a. Processing of personal data for purposes such as research, planning and statistics by anonymising them with official statistics,
- b. Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defence, national security, public security, public order, economic security, privacy of private life or personal rights or constitute a crime,
- c. Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organisations entrusted and authorised by law to ensure national defence, national security, public safety, public order or economic security,

d. Processing of personal data by judicial authorities or enforcement authorities in relation to investigation, prosecution, judgement or execution proceedings.

Pursuant to Article 28/2 of the KVK Law; In the cases listed below, personal data owners cannot assert their other rights listed in 20.1.1. except for the right to demand compensation for the damage:

- a. Processing of personal data is necessary for the prevention of crime or criminal investigation,
- b. Processing of personal data made public by the personal data subject himself/herself,
- c. Processing of personal data is necessary for the execution of supervisory or regulatory duties and disciplinary investigation or prosecution by the public institutions and organisations and professional organisations in the nature of public institutions, which are authorized by law,
- d. Processing of personal data is necessary for the protection of the economic and financial interests of the State in relation to budgetary, tax and fiscal matters.

#### 20.1.3. Exercising the Rights of the Personal Data Owner

Personal data owners will be able to submit their requests regarding their rights specified in this Policy to **FİSTAŞ free of charge by** filling out and signing the Application Form with the information and documents that will identify their identity and by the methods specified below or by other methods determined by the Personal Data Protection Board.

After filling in the form available at [www.fistas.com](http://www.fistas.com), submitting a wet signed copy to **DOSAB Mustafa Karaer Cd. N:25 OSMANGAZİ / BURSA** address by hand or in writing by registered mail with return receipt requested or applying in person,

Filling in the form available at [www.fistas.com](http://www.fistas.com) and after signing with the "secure electronic signature" within the scope of the Electronic Signature Law No. 5070, sending the form with secure electronic signature to [kvkk@fistas.com](mailto:kvkk@fistas.com) via registered e-mail, using secure electronic signature, mobile signature or the e-mail address previously notified to **FİSTAŞ** by the relevant person and registered in the system of FİSTAŞ or by using a software or application developed for the purpose of application,

Making the application through notary public through official channels,

In order for the above-mentioned application to be accepted as a valid application, in accordance with the Communiqué on Application Procedures to the Data Controller, in the application, the relevant person must state that;

- a) Name, surname and signature if the application is in writing,
- b) Turkish Republic ID number for citizens of the Republic of Turkey, nationality, passport number or ID number, if any, for foreigners,
- c) Residential or workplace address for notification,
- ç) Electronic mail address, telephone and fax number for notification, if any,
- d) Demand issue,

It is obligatory to specify the information. Otherwise, the application will not be considered as a valid application. For applications to be made without filling out the application form, the issues listed here must be submitted to **FİSTAŞ in full**.

In order for third parties to make an application request on behalf of personal data owners, there must be a special power of attorney issued by the data owner through a notary public on behalf of the person who will make the application.

## 21. THE RELATIONSHIP OF FİSTAŞ PERSONAL DATA PROTECTION AND PROCESSING POLICY WITH OTHER POLICIES

F İ S T A Ş has associated with this Policy the basic policies, procedures and instructions written/to be written on the protection and processing of personal data related to the principles set forth by this Policy. By linking these policies, procedures and instructions with the basic processes carried out by **FİSTAŞ** in other areas, harmony is ensured between the processes that **FİSTAŞ** operates with different policy principles for similar purposes.

## 22. FİSTAŞ PERSONAL DATA PROTECTION AND PROCESSING PROCESSES COORDINATION

A management structure has been established by **FİSTAŞ** to ensure compliance with the regulations of the KVK Law and the enforcement of the Personal Data Protection and Processing Policy.

A "Personal Data Protection Board" has been established within **FİSTAŞ** in accordance with the decision of the senior management of the Company to manage this Policy and other policies related and related to this Policy.

The Board consists of the units whose titles, duties in the business unit and job descriptions are given below, and the duties of the Board are generally as follows.

#### 22.1 FİSTAŞ Personal Data Protection Board

Unit/Title	Job Description
<b>Chairman of the Board FINANCIAL AFFAIRS MANAGER</b>	Meeting of the Board, implementation and execution of policies, realisation of secretariat services and informing the Board of Directors about the process, follow-up of relations with the Personal Data Protection Board, follow-up and implementation of Board Decisions and management of processes. Representation of the Company before the Board.
<b>INFORMATION PROCESSING OFFICER</b>	Creating, monitoring, implementing, destroying and anonymising information processing systems, establishing the necessary mechanisms for transferring data domestically and abroad, ensuring the security of data, systems that provide data security proposition, practice.
<b>HUMAN RESOURCES OFFICER</b>	The Human Resources Officer is responsible for the execution and planning of FİSTAŞ human resources affairs, the execution of the Policies in accordance with their duties and the appropriate protection of personal data.
<b>QUALITY ASSURANCE OFFICER</b>	Responsible for the preparation, development, execution, publication in relevant media and updating of policies.

The duties of the Personal Data Protection Board regarding the protection of personal data are set out below:

- To prepare and put into effect the basic policies on the protection and processing of personal data and amendments when necessary and submit them to the approval of the senior management,
- To decide how the implementation and supervision of the policies regarding the protection and processing of personal data will be carried out and to submit the issues of making internal assignments and ensuring coordination within this framework to the approval of senior management,
- To determine the matters that need to be done to ensure compliance with the PDP Law and related legislation, to submit them to the approval of senior management, to oversee their implementation and to ensure their coordination,
- To raise awareness within **FİSTAŞ** and before the institutions with which **FİSTAŞ** cooperates on the protection and processing of personal data,
- To identify the risks that may occur in the personal data processing activities of **FİSTAŞ**, to ensure that the necessary measures are taken, and to submit the improvement suggestions to the senior management for approval,
- To organise trainings on the protection of personal data and the implementation and dissemination of policies, to ensure that personal data owners are informed about personal data processing activities and their legal rights,
- To finalise the applications of personal data subjects at the highest level,
- To follow the developments and regulations on the protection of personal data, to receive suggestions on what needs to be done within FİSTAŞ in accordance with these developments and regulations,
- To carry out relations with the PDP Board and the Authority,
- To perform other duties to be assigned by the senior management of the company regarding the protection of personal data.

This Policy may be revised by the Company when deemed necessary. In case of revision, the most up-to-date version of the Policy will be available on the Company's website.

Revision Date: 01.01.2020

**FİSTAŞ** Fancy Yarn San. Ve Tic A.Ş (Data Controller)

DOSAB Mustafa Karaer Cd. N:25 OSMANGAZI / BURSA

MersisNo : 0388002954800018

## ANNEX-1 DEFINITIONS

**Explicit Consent :** Consent on a specific subject, based on information and expressed with free will.

**Anonymisation :** It is the modification of personal data in such a way that it loses its personal data nature and this situation cannot be reversed. Ex: Masking, aggregation, data corruption, etc. Making personal data impossible to be associated with a real person by means of techniques.

**Application Form :** "Application Form Regarding the Applications to be made to the Data Controller by the Relevant Person (Personal Data Owner) in accordance with the Law No. 6698 on the Protection of Personal Data", which includes the application to be made by personal data owners to exercise their rights.

**Employee Candidate :** Real persons who have applied for a job to FİSTAŞ in any way or who have opened their CV and related information.

**Employees, Shareholders and Authorities of Institutions in Cooperation :** Real persons, including, but not limited to, employees, shareholders and officials of the institutions (such as business partners, suppliers, etc.) with which FİSTAŞ has any kind of business relationship.

**Business Partner :** The parties with whom FİSTAŞ has established a business partnership for purposes such as carrying out various projects and receiving services, either personally or together with Group Companies while carrying out its commercial activities.

**Processing of Personal Data :** All kinds of operations performed on personal data such as obtaining, recording, storing, preserving, modifying, reorganising, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or by non-automatic means provided that it is part of any data recording system.

**Personal Data Owner :** The real person whose personal data is processed. For example; customer, staff,

**Personal Data :** Any information relating to an identified or identifiable natural person. Therefore, the processing of information on legal entities is not covered by the Law. For example; name-surname, Turkish ID number, e-mail, address, date of birth, credit card number, etc.

**Special Categories of Personal Data :** Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data.

**Supplier :** Parties that provide services to FİSTAŞ on a contractual basis in accordance with the orders and instructions of FİSTAŞ while conducting FİSTAŞ's commercial activities.

**Third Person :** Natural persons whose personal data are processed within the scope of the policy, who are not defined differently within the scope of the policy (e.g. family members, former employees).

**Data Processor :** Real and legal person who processes personal data on behalf of the data controller based on the authorisation given by the data controller. For example, suppliers, legal advisors, cloud computing company that holds the data of FİSTAŞ,

**Data Controller :** The person who determines the purposes and means of processing personal data and manages the place where the data is kept systematically (data recording system). Within the scope of this policy, FİSTAŞ Fantezi İplik San. Ve Tic A.Ş is the data controller.

**Deletion of Data:** It refers to the situation where all relevant users within the company are encrypted in such a way that access to personal data is prevented and only the data protection officer has this password.

**Destruction of Data :** It refers to the situation where personal data is completely eliminated physically or by technological methods in a way that cannot be reversed again.

**Visitor** Real persons who have entered the physical premises owned by FİSTAŞ for various purposes or who visit our websites.