



**CRONIMET TURKEY METAL TİCARET A.Ş.
PROTECTION OF PERSONAL DATA AND
GENERAL POLICY OF PROCESSING**

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1. CHAPTER 1: INTRODUCTION

1.1. Introduction

Protection of personal data is of great importance to CRONIMET TURKEY METAL TRADE Inc. ("CRONIMET" or "Company") and is a priority for the company. This includes the maximum sensitivity to the protection of personal data of employees applying for a job in CRONIMET, insured persons, Company officials, central office and facility visitors, and the personal data of the institutions and organizations employees, authorities and Company in which CRONIMET is engaged in commercial relations.

The administrative and technical measures required by CRONIMET are taken to protect personal data that is processed according to the relevant legislation. In this Policy, detailed explanations regarding the basic principles that CRONIMET adopts in the processing of personal data are to be made:

- Process personal data in accordance with law and code of integrity,
- Keeping personal data accurate and up to date when necessary,
- Processing personal data for specific, clear and legitimate purposes,
- Limited and measured processing of personal data in relation to the purpose for which they are processed,
- Retain personal data for the time required for the purpose for which they are envisioned or processed in the relevant legislation,
- Lighting and informational personal data owners,
- Set up the system for personal data owners to use their rights,
- Taking the necessary precautions in the protection of personal data,
- To comply with the relevant legislation and the provisions of the Personal Data Protection Board ("KVK Board") in the transfer of personal data to third parties in line with the requirements of the purpose of processing personal data,
- Demonstrate the precision required to handle and protect specially qualified personal data.

1.2. The purpose of politics

The main purpose of this Policy is to provide explanations on the personal data processing activity and systems adopted by the Company in accordance with the law and to protect personal data, our candidates, employees, Company officials, visitors, To ensure transparency by notifying the Company's people who are processing personal data, especially the employees of the institution and organization in which CRONIMET is engaged in commercial relations, as well as the authorities and third parties.

1.3. Scope

This Policy; , Employees applying for work within the company, persons working insured within CRONIMET, Company officials, central office and facility visitors, the organization and organizers where the Company is in business, It is related to all personal data processed by its authorities and CRONIMET in some way by any third party in which CRONIMET processes personal data, either automated or not automatically, provided that it is part of any data logging system.

1.4. The effectiveness of politics

This Policy was issued by CRONIMET and entered into force by the Board of Directors decision taken on [****]. The policy is published on CRONIMET's website and is offered to the access of individuals at the request of personal data owners.

2. SECTION 2: PERSONAL DATA PROTECTION CONSIDERATIONS

2.1. To ensure the security of personal data

CRONIMET, Personal Data Protection Act No. 6698 (KVK Act) 12. In accordance with , to prevent the illegal processing of personal data in which it is processing, to prevent data from being accessed illegally, and to ensure proper security level to ensure the protection of data, it takes the necessary technical and administrative measures, and to carry out or carry out the necessary controls in this context.

2.1.1. Technical and Administrative measures to ensure that personal data is handled in accordance with the law, to prevent access to and protect against the law

Technological facilities to ensure that personal data is processed in accordance with the law, is not disclosed, accessed, transferred or otherwise accessed by CRONIMET, and to prevent it from being stored in safe environments and destroyed, lost or replaced for illegal purposes, In the framework of current implementation and development, the guidelines published by the Board of KVK are taking the necessary technical and administrative measures.

The technical measures taken in this context are as follows;

- Network security and application security are provided.
- Private data transfers via the network use a closed system network.
- Key management is in place.
- Security measures are taken in supply, development and maintenance of information technology systems.
- The authorization matrix has been created for employees.
- Access logs are kept regularly.
- Employees who have a change of mission or have left work are disauthorized in this area.
- Current anti-virus systems are used.
- Firewalls are used.
- Tracking personal data security is being carried out.
- The necessary safety measures for entering and exiting physical environments with personal data are taken.
- Security of personal data-containing media is provided.
- Personal data is backed up and the security of the backed up personal data is provided.
- The user account management and authorization control system are being implemented and followed up.

- Log records are kept in a manner that does not include user intervention.
- Current risk and threats have been identified.
- Attack detection and prevention systems are used.
- Leak testing is in place.
- Cybersecurity measures have been taken and their implementation is constantly monitored.
- Encryption is in progress.
- Data loss prevention software is used.

The administrative measures taken under this scope are as follows;

- Key management is in place.
- Security measures are taken in supply, development and maintenance of information technology systems.
- There are disciplinary regulations for employees that include data security provisions.
- Training and awareness work is underway on data security for employees at intervals.
- The authorization matrix has been created for employees.
- Institutional policies have been prepared and implemented in access, information security, use, storage and destruction.
- Privacy commitments are made.
- Employees who have a change of mission or have left work are disauthorized in this area.
- Signed agreements include data security provisions.
- Extra security measures are taken for personal data transferred via paper and the relevant document is sent in a privacy-grade document format.
- Personal data security policies and procedures have been established.
- Personal data security issues are reported quickly.
- Tracking personal data security is being carried out.
- The necessary safety measures for entering and exiting physical environments with personal data are taken.
- External risks of physical environments with personal data (fire, flood, etc.) it is secured against.
- Security of personal data-containing media is provided.
- Personal data is reduced as much as possible.
- Internal periodic and/or random inspections are performed and performed.
- Current risk and threats have been identified.
- Protocols and procedures for private quality personal data security are established and implemented.
- Data-processing service providers are monitored periodically for data security.
- Data-processing service providers are aware of data security.

2.1.2. Control of measures taken to protect Personal Data

The company is 12 of the KVK Law. in accordance with , it makes or makes necessary inspections within its own body. These audit results are reported to managers and departments on the subject as part of the internal operation of the company, and the actions required to improve the measures taken are carried out.

2.1.3. Measures to be taken in the event of unauthorized disclosure of personal data

CRONIMET is the 12 of the KVK Law. In the event that personal data processed in accordance with the article is obtained by others in unlawful ways, it operates the internal mechanism that enables it to be notified to the relevant personal data owner and the KVK Board as soon as possible. If necessary by the Board of VRC, this can be declared on the website of the Board of VRC or by another method.

2.2. Assessing Data Owner's Claims and producing methods in which the Owner can deliver their Claims

The CRONIMET shall be used to assess the rights of personal data owners and to provide the necessary information to personal data owners 13 of the VK Law. in accordance with , he conducts the required channels, internal operation, administrative and technical regulations. In the event that personal data owners submit their claims in writing to CRONIMET, the Company fines the claim free of charge within thirty days of the minimum, according to the nature of the claim. However, in the event of a fee stipulated by the KVK Board, the rate set by the Company by the KVK Board will be charged by the data owner. Personal data owners;

- Find out if personal data has been processed,
- Requesting information about personal data if it has been processed,
- Learn the purpose of processing personal data and whether they are used for their purpose,
- Knowing third parties in which personal data is transferred, whether domestic or abroad,
- Request that personal data be corrected in the event that it is incomplete or incorrectly processed, and that the transaction in this context be notified to third parties where personal data is transferred,
- Even though it has been processed in accordance with the KVK Law and other relevant law provisions, do not request the removal or destruction of personal data in the event that the reasons for which it is to be processed, and request that the transaction in this context be notified to third parties where personal data is transferred,
- Objecting to the appearance of a result against the individual by analyzing the processed data exclusively through automated systems,
- They have the right to request that damage be remedied if the damage is caused by the illegal processing of personal data.

2.3. Protection of Special Quality Personal Data

Special attention has been taken in the event that some type of personal data is processed in violation of the law by the KVK Law, as a result of the risk of causing victims or discrimination of persons. These data types are 6 of the KVK Law. as stated in; race, ethnicity, political thought, philosophical belief, religion, religious or other beliefs are biometric and genetic data related to clothing, clothing, associations, foundations or union membership, health, sexual life, criminal conviction and security measures.

The CRONIMET demonstrates the sensitivity to the processing and protection of the personal data identified by the KVK Law as "special quality" and as shown above in accordance with the law. In this context, all technical and administrative measures taken by CRONIMET for the protection of personal data are carefully implemented in terms of special quality personal data and the necessary controls are provided within the Company.

2.4. Increase and Control Company Units' Awareness in the Protection and Processing of Personal Data

CRONIMET provides the necessary training to the business units to improve awareness of the processing of personal data against the law, preventing access to data against the law, and ensuring the protection of data. In this context, the necessary systems are set up to raise awareness of the protection of personal data of the existing employees of the Company's business units and newly involved employees within the business unit, and professional persons are employed if necessary.

The training results for increasing awareness of the protection and processing of personal data of CRONIMET's business units are reported to Company officials. In this respect, the company evaluates and supervises the participation in relevant training, seminars and briefing sessions. However, CRONIMET updates and refreshes its training in line with the update of the legislation on protecting personal data and policy decisions taken by the CCC Board.

3. SECTION 3: PROCESSING OF PERSONAL DATA

3.1. Processing of personal data in accordance with the regulations

3.1.1. Process in accordance with Law and Integrity Rules

CRONIMET; it is in accordance with the general rules of trust and honesty, with the principles brought by law regulations in the processing of personal data. In this context, the Company considers the requirements for proportionality, measurement and limitation in the processing of personal data, and does not use personal data in any way that is not relevant to the purpose or purpose.

3.1.2. Ensure Personal Data is accurate and up to Date when needed

CRONIMET; taking into account the fundamental rights of personal data owners and their legitimate interests, it ensures that the personal data it processes is accurate and up to date. In this respect, he is taking the necessary precautions. In this context, personal data owners whose personal data has been processed by CRONIMET; They can contact the Company at any time to correct and verify their personal data. The applications obtained in this context are evaluated by CRONIMET's competent units and provided corrections and validation if the request is in place.

3.1.3. Handling for specific, Open and legitimate purposes

CRONIMET clearly and precisely determines the purpose of personal data processing, which is legitimate and legal. In this context, the company only processes personal data in connection with and necessary for commercial and business activities in which it is running. The purpose for which personal data is processed by the company is determined and determined before the personal data processing activity begins.

3.1.4. Being connected, Limited and measured for the purpose they are processed

CRONIMET processes personal data in a manner that is suitable for the purposes set and avoids processing personal data that is not or is not required for the purpose to be carried out. In this context, personal data processing activities are not carried out to meet potential future needs.

3.1.5. Enclosures up to the time required for the Purpose in which they are envisioned or processed

The CRONIMET maintains personal data only for the time required for the purpose specified in the relevant legislation or for which they are processed. In this context, the Company first determines whether personal data is foreseen in the relevant legislation for a period of time, if a period of time has been set, it conforms to that time, and if not specified, it stores personal data for the purpose for which they are processed. Personal data is deleted, destroyed, or anonymized by the Company if any reason for the period to be expired or processed is eliminated.

3.2. Personal Data Owner Illumination

CRONIMET is the 10 of the KVK Law. In accordance with , it illuminates Personal Data Owners during the acquisition of personal data. In this context, CRONIMET provides guidance on identifying information about the data person, what purpose personal data will be processed, who and for what purpose the personal data may be transferred, the method and legal reason for personal data collection and the rights owned by the personal data owner.

20 of the Constitution. it was stated that everyone has the right to be informed about personal data about themselves. In this respect, 11 of the KVK Law. article entitled "requesting information" is also included in the rights of the personal data owner. In this context, the Company is 20 of the Constitution. And 11 of the KVK Law. In accordance with its articles, the Personal Data Owner makes the necessary notification if they request information.

3.3. Processing of Public and Private Personal Data

The company recognizes that protecting personal data is a Constitutional right and obligation. Fundamental rights and freedoms may be limited to the law, and only to the reasons stated in the relevant articles of the Constitution, regardless of their essence. 20 of the Constitution. in accordance with the third paragraph of the article, personal data may only be processed in the cases stipulated in the law or by the express consent of the person. The company is in this respect and in accordance with the Constitution; Personal data is only processed in the 5/2 paragraph of the KVK Law and in the cases stipulated in other laws or by the express consent of the person.

CRONIMET strictly complies with the regulations stipulated in the KVK Law, secondary regulations and binding KVK Board decisions in the processing of personal data determined as "special quality" by the KVK Law. By CRONIMET in accordance with the KVK Law; Special categories of personal data are processed in the following cases, provided that adequate measures to be determined by the KVK Board are taken:

- If the personal data owner has express consent, or
- If there is no explicit consent of the personal data owner;
 - Special categories of personal data other than the health and sexual life of the personal data owner, in cases stipulated by the laws,
 - Special quality personal data regarding the health and sexual life of the personal data owner, are processed only for the purposes of protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, or persons or authorized institutions under the obligation of confidentiality;

3.4. Domestic Transfer of Personal Data

CRONIMET can 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 personal data processing purposes in accordance with the law. In this context, the Company acts in accordance with the regulations stipulated in Article 8 of the KVK Law.

CRONIMET can transfer personal data to third parties, based on one or more of the personal data processing conditions specified in Article 5 of the KVK Law, and limitedly, in line with the legitimate and lawful personal data processing purposes:

- If the personal data owner has express consent,
- If there is a clear regulation in the law regarding the transfer of personal data,
- If it is necessary for the protection of the life or bodily integrity of the personal data owner or someone else, and the personal data owner is unable to express his consent due to actual impossibility or if his consent is not legally valid;
- 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 the Company to fulfill its legal obligations,
- If personal data has been made public by the personal data owner,
- If personal data transfer is necessary for the establishment, exercise or protection of a right,
- If personal data transfer is necessary for the Company's legitimate interests, provided that it does not harm the fundamental rights and freedoms of the personal data owner.

CRONIMET by showing due diligence, taking the necessary security measures and taking the adequate measures prescribed by the KVK Board; In line with the legitimate and lawful personal data processing purposes, the personal data of the personal data owner may be transferred to third parties in the following cases.

- If the personal data owner has express consent, or
- If there is no explicit consent of the personal data owner;
 - Special categories of personal data other than the health and sexual life of the personal data owner (race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, clothing, association, foundation or union membership, criminal conviction and security measures) data and biometric and genetic data), in cases stipulated by law,
 - Persons or authorized institutions, who are under the obligation to keep confidential, for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, by organisations.

3.5. Transfer of Personal Data Abroad

CRONIMET can 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 legal personal data processing purposes. By the company; Personal data can be transferred to foreign countries that are declared to have sufficient protection by the KVK Board or, in the absence of sufficient protection, to foreign countries where the data controllers in Turkey and the relevant foreign country undertake an adequate protection in writing and where the permission of the KVK Board is available. In this direction, CRONIMET acts in accordance with the regulations stipulated in Article 9 of the KVK Law.

4. CHAPTER – 4: CATEGORIZATION OF PERSONAL DATA AND PURPOSE OF PROCESSING

4.1. Categorization of Personal Data

Within CRONIMET; In line with the legitimate and lawful personal data processing purposes of the company, based on and limited to one or more of the personal data processing conditions specified in Article 5 of the KVK Law, the general principles specified in the KVK Law, especially the principles specified in the 4th article regarding the processing of personal data, personal data in the categories specified below, limited to the subjects within the scope of this Policy, are processed by informing the relevant persons in accordance with Article 10 of the KVK Law.

- **Identity information:** Name-surname,
Documents such as driver's license, identity card and passport containing information such as identity number, nationality information, mother's name and father's name, place of birth, date of birth, gender, and data such as tax number, social insurance number, signature information, vehicle license plate.
- **Contact information:** Information such as phone number, address, e-mail address, fax number, IP address
- **Location data:** Information such as travel data, flight ticket and hotel reservations, vehicle tracking system
- **Personal information:** All kinds of personal data processed for obtaining the information that will form the basis of the personal rights of real persons who are in a working relationship with the Company.
- **Legal Action:** Information in correspondence with judicial authorities, Information in the case file, etc.
- **Customer Transaction:** Call center records, Invoice, promissory note, check information, Information on box office receipts, Order information, Request information, etc.
- **Transaction Security:** IP address information, website login and exit information, Password and password information, etc.
- **Risk Management:** Information processed for the management of commercial, technical, administrative risks, etc.
- **Security information:** Personal data regarding the records and documents taken at the entrance to the physical space, during the stay in the physical space; camera records, fingerprint records and records taken at the security point, etc.
- **Financial information:** Personal data related to information, documents and records showing all kinds of financial results created according to the type of legal relationship established with the personal data owner, and data such as bank account number, IBAN number, financial profile, asset data, income information, circular of signature.
- **Audio/Visual information:** Photo and camera recordings.
- **Professional Experience:** Diploma information, Courses attended, In-service training information, Certificates, Transcript information, etc.
- **Marketing:** Shopping history information, Survey, Cookie records, Information obtained through Campaign work, etc.
- **Health Information:** Information about disability, Blood group information, Personal health information, Device and prosthesis information etc.
- **Special quality personal data:** Employees' health reports, biometric data, blood group, reports that are required to be taken within the scope of occupational health and safety, documents that are required to be collected in the legislation for heavy work, etc.

4.2. Purposes of Processing Personal Data

CRONIMET processes personal data limited to the purposes and conditions within the personal data processing conditions specified in paragraph 2 of article 5 of the KVK Law and paragraph 3 of article 6 of the KVK Law. These purposes and conditions;

- It is clearly stipulated in the Laws for the Company to carry out relevant activities regarding the processing of your personal data,
- The processing of your personal data by CRONIMET is directly related to and necessary for the establishment or performance of a contract,
- The processing of your personal data is mandatory for the Company to fulfill its legal obligations,
- Processing of your personal data by the Company in a limited manner for the purpose of making it public, provided that your personal data has been made public by you,
- The processing of your personal data by CRONIMET is mandatory for the establishment, exercise or protection of the rights of the Company or you or third parties,
- It is mandatory to process personal data for the legitimate interests of CRONIMET, provided that it does not harm the fundamental rights and freedoms of natural persons whose personal data are processed,
- It is stipulated in the laws in terms of special quality personal data other than the health and sexual life of the personal data owner,
- In terms of sensitive personal data related to the health and sexual life of the personal data owner, persons or authorized institutions under the obligation to keep confidential for the purpose of protecting public health, conducting preventive medicine, medical diagnosis, treatment and care services, planning and managing health services and financing, and processed by organizations.

In this context, CRONIMET processes your personal data for the following purposes:

- Planning and execution of corporate sustainability activities,
- Event and orientation management,
- Management of relations with business partners or suppliers,
- Execution of CRONIMET employment processes,
- Execution/follow-up of the company's financial reporting and risk management transactions,
- Execution/follow-up of the company's legal affairs,
- Planning and execution of corporate communication activities,
- Execution of corporate governance activities,
- Request and complaint management,
- Planning and execution of audit activities to ensure that CRONIMET local and global procedures are carried out in accordance with the relevant legislation,
- Carrying out studies to protect the reputation of CRONIMET,
- Managing investor relations,
- Giving information to authorized institutions based on legislation,
- Creation and tracking of visitor records

If the processing activity carried out for the aforementioned purposes does not meet any of the conditions stipulated in the KVK Law, your explicit consent is obtained by the Company regarding the relevant processing process.

5. CHAPTER – 5: THIRD PARTIES TO WHICH PERSONAL DATA IS TRANSFERRED AND THE PURPOSE OF TRANSFER

CRONIMET notifies the personal data owner of the groups of persons to whom personal data is transferred in accordance with Article 10 of the KVK Law. In accordance with Articles 8 and 9 of the KVK Law, the personal data of data subjects managed by this Policy can be transferred to the following categories of persons:

- I. To business partners of the company,
- ii. to company suppliers,
- iii. To company shareholders
- iv. To company officials,
- v. To legally authorized public institutions and organizations,
- vi. To legally authorized private legal persons.

Personal data to the above-mentioned recipient groups;

- **To business partners;** In order to ensure the fulfillment of the purposes of the establishment of the business partnership,
- **To suppliers;** In order to ensure that the services that CRONIMET outsources from the supplier and that are necessary to carry out the commercial activities of the Company are provided to the Company,
- **To the shareholders;** For the purposes of activities carried out by CRONIMET within the scope of company law, event management and corporate communication processes in accordance with the provisions of the relevant legislation,
- **To company officials;** In accordance with the provisions of the relevant legislation, for the purposes of designing the strategies regarding the commercial activities of CRONIMET, ensuring its management at the highest level and auditing,
- **To legally authorized public institutions and organizations;** For the purpose requested by the relevant public institutions and organizations within their legal authority,
- **To legally authorized private legal persons;** It is transferred for the purpose requested by the relevant private legal persons within their legal authority.

6. CHAPTER– 6: DELETING, DESTROYING AND ANNOUNCEMENT OF PERSONAL DATA

6.1. Company's Obligation to Delete, Destroy and Anonymize Personal Data

Although it has been processed in accordance with the provisions of the relevant law as regulated in Article 138 of the Turkish Penal Code and Article 7 of the Law, in the event that the reasons requiring its processing are eliminated, personal data is deleted, destroyed or made anonymous upon the decision of the Company or upon the request of the personal data owner. In this context, CRONIMET fulfills its obligations with the methods described in this section.

6.2. Techniques for Deletion, Destruction and Anonymization of Personal Data

6.1.1. Deletion and Destruction Techniques of Personal Data

Although it has been processed in accordance with the provisions of the relevant law, CRONIMET may delete or destroy personal data at its own discretion or upon the request of the personal data owner, in the event that the reasons for its processing disappear. The most commonly used deletion or destruction techniques by CRONIMET are listed below:

(i) Physical Destruction: Personal data can also be processed by non-automatic means, provided that they are part of any data recording system. While such data is being deleted/destroyed, a system of physical destruction of personal data is applied so that it cannot be used later.

(ii) Secure Deletion from Software: While deleting/destroying data processed by fully or partially automated means and stored in digital media; methods are used to delete the data from the relevant software in a way that cannot be recovered again.

(iii) Secure Deletion by Outsourcing Service When Necessary: CRONIMET may agree with an expert to delete the personal data processed on its behalf, when needed. In this case, personal data is securely deleted/destroyed by the person who is an expert in this field, in a way that cannot be recovered.

6.1.2. Techniques to Anonymize Personal Data

Anonymization of personal data means that personal data cannot be associated with an identified or identifiable natural person under any circumstances, even by matching them with other data. CRONIMET can anonymize personal data when the reasons requiring the processing of personal data processed in accordance with the law disappear. In accordance with Article 28 of the Law; Anonymized personal data may be processed for purposes such as research, planning and statistics. Such processing is outside the scope of the Law and the explicit consent of the personal data owner will not be sought. Anonymization techniques preferred by CRONIMET are listed below;

- (i) Masking,
- (ii) Aggregation,
- (iii) Data Derivation,

7. CHAPTER – 7: RIGHTS OF PERSONAL DATA OWNERS, USE AND ASSESSMENT OF RIGHTS

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

7.1. Data Owner's Rights and Use of These Rights

7.1.1. Rights of Personal Data Owner

Personal data owners have the following rights:

- a) Learning whether personal data is processed or not,
- b) If personal data has been processed, requesting information about it,
- c) Learning the purpose of processing personal data and whether they are used in accordance with its purpose,
- d) Knowing the third parties to whom personal data is transferred in the country or abroad,
- e) Requesting correction of personal data in case of incomplete or incorrect processing and requesting notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,
- f) Requesting the deletion or destruction of personal data in the event that the reasons requiring its processing cease to exist despite the fact that it has been processed in accordance with the provisions of the law and other relevant laws, and requesting the

notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,

g) Objecting to the emergence of a result against the person himself by analyzing the processed data exclusively through automated systems,

h) To request the compensation of the damage in case of loss due to unlawful processing of personal data.

7.1.2. Circumstances in which the Personal Data Owner cannot assert his rights

Since the following situations are excluded from the scope of the Law pursuant to Article 28 of the Law, personal data owners cannot claim the above-mentioned rights in these matters:

1) Processing of personal data for purposes such as research, planning and statistics by making them anonymous with official statistics.

2) Processing personal data for art, history, literature or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, public order, economic security, privacy of private life or personal rights or constitute a crime.

3) Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public safety, public order or economic security.

4) Processing of personal data by judicial authorities or execution authorities in relation to investigation, prosecution, trial or execution proceedings.

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

1) The processing of personal data is necessary for the prevention of crime or for criminal investigation.

2) Processing of personal data made public by the personal data owner.

3) The processing of personal data is necessary for the execution of supervisory or regulation duties and for disciplinary investigation or prosecution by the authorized public institutions and organizations and professional organizations in the nature of public institution, based on the authority given by the law.

4) The processing of personal data is necessary for the protection of the economic and financial interests of the State with regard to budgetary, tax and financial matters.

7.1.3. Exercise of Personal Data Owner's Rights

Personal Data Owners will be able to submit their requests regarding their rights listed above to the Company by filling out and signing the Application Form, with the information and documents that will determine their identity, and with the methods specified below or other methods determined by the Personal Data Protection Board:

1) After filling out the form at <http://cronimet.com.tr/>, a signed copy can be sent to "Suadiye Mah. Öncü Sokak No:1 Flat:2, 34740 Kadıköy/İSTANBUL" address,

2) To use your KEP (Registered Electronic Mail) address, secure electronic signature, mobile signature or your e-mail address previously notified to CRONIMET and registered in the Company's system to use [kep address] or send it to info@cronimet.com.trad.

In order for third parties to apply on behalf of personal data owners, a special power of attorney issued by the data owner through a notary public on behalf of the person to apply must be present.

7.2. Responses to Applications

It is only necessary to apply to CRONIMET in cases where the Company is considered a data controller under the Law. This situation may exist in cases where the Company collects personal data directly from the person concerned. Apart from these, applications regarding personal data processing activities for which other companies are considered to be data controllers must be made to the relevant company, not to the Company.

7.2.1. Procedure and Time to Respond to Applications

If the personal data owner submits his request to CRONIMET in accordance with the above procedure, CRONIMET will conclude the relevant request free of charge within thirty days at the latest, depending on the nature of the request. However, according to the Communiqué on the Procedures and Principles of Application to the Data Controller, in case of a written response to your applications, no fee will be charged for the first 10 pages, and a fee of 1 TL will be charged to you for each subsequent page. Depending on the nature of your application, if your request is answered via recording media such as CD and flash memory, the cost of the recording media will be charged to you.

7.2.2. Information That Can Be Requested From The Personal Data Owner Applicant

CRONIMET may request information from the person concerned in order to determine whether the applicant is the owner of personal data. In order to clarify the issues in the personal data owner's application, the company may ask questions about the personal data owner's application.

7.2.3. The Right to Refuse the Application of the Personal Data Owner

CRONIMET may reject the application of the applicant in the following cases by explaining the reason:

- 1) Processing of personal data for purposes such as research, planning and statistics by making them anonymous with official statistics.
- 2) Processing personal data for art, history, literature or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, public order, economic security, privacy of private life or personal rights or constitute a crime.
- 3) Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public safety, public order or economic security.
- 4) Processing of personal data by judicial authorities or execution authorities in relation to investigation, prosecution, trial or execution proceedings.
- 5) Processing of personal data is necessary for the prevention of crime or for criminal investigation.
- 6) Processing of personal data made public by the personal data owner.

- 7) Personal data processing is necessary for the execution of supervisory or regulatory duties and for disciplinary investigation or prosecution by authorized and authorized public institutions and organizations and professional organizations in the nature of public institution, based on the authority given by the law.
- 8) Processing of personal data is necessary for the protection of the economic and financial interests of the State with regard to budgetary, tax and financial matters.
- 9) Request of the personal data owner is likely to prevent the rights and freedoms of other persons.
- 10) Requests that require disproportionate effort have been made.
- 11) The requested information is publicly available information.

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