



# **PERSONAL DATA PROTECTION AND PROCESSESSING POLICY**

Version II

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## I.Definitions

<b>Express Consent</b>	It refers to any consent that is based on informing a person on a specific subject and is disclosed with free will.
<b>Anonymization</b>	It refers to rendering personal data impossible to associate with an identified or identifiable natural person, even through matching with other data.
<b>Personal Data</b>	It refers to any information of an identified or identifiable natural person.
<b>Personal Data of Special Nature</b>	Personal data relating to the race, ethnic origin, political thought, philosophical belief, religion, sect or other beliefs, costume and attire, membership to any association, foundation or trade union, health, sexual life, criminal conviction and security measures and biometric and genetic data are deemed to be personal data of special nature.
<b>Processing of Personal Data</b>	Any operation performed on personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable, classification or preventing the use thereof, fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means,
<b>Board</b>	It refers to the Personal Data Protection Board.
<b>Policy</b>	It refers to the Personal Data Protection and Processing Policy of Remik Kimya Sanayi ve Ticaret A.Ş.
<b>Data Processor</b>	It refers to any real and legal person who processes personal data based on the power granted by the data controller on behalf of the data controller.
<b>Data Controller</b>	It refers to any person who determines the purposes and means of processing personal data and manages the place where the data are systematically kept (data recording system).

## II.Purpose

This Policy is prepared with the aim of determining the basic principles and implementation principles to be adopted in ensuring compliance by Remik Kimya Sanayi ve Ticaret A.Ş. (“Remik”) with its registered office at Esenler Mah. Kahramanlar Cad.

No:71. 34899 Pendik / Istanbul and CRS Number: 0734006530327280, with the obligations imposed on data controllers within the scope of the Personal Data Protection Law No. 6698 (the "PDPL"), entered into force after published in the Official Gazette, dated 7 April 2016.

### **III.Scope and Amendments**

This Policy is prepared in accordance with the PDPL and it relates to all personal data of our potential customers and employees, and employees, shareholders and officials of organizations and third-parties we cooperate with, processed by automated means or non-automated means provided that they are part of any data recording system. Remik Kimya reserves the right to amend the Policy in line with the amendments to be made in the PDPL and relevant regulation.

### **IV.Principles applicable to the processing of personal data**

Remik Kimya has adopted the following principles in collecting, processing and analysing personal data.

#### **a. Acting in compliance with law and rules of integrity**

Remik Kimya will collect and process personal data in accordance with law and in a fair manner to protect the rights of data subjects. The principles of proportionality and necessity will be considered in the execution of these activities.

#### **b. Purpose-specific restriction**

Personal data can only be processed for purposes defined before data is collected. Additional changes to the purpose are only possible with restrictions and justification.

#### **c. Transparency and disclosure**

Data subjects should be informed in detail before collection and processing of their personal data. Right holders should be informed about the following before their data is collected:

- identity of data controller and its representative, if any;
- purpose of processing personal data;
- to whom and for what purpose personal data processed is transferred;
- method and legal ground for collection of personal data;
- rights of the person whose personal data is processed under Article 11 of the PDPL.

#### **d. Data economy**

Before the processing of personal data, it should be determined whether the transaction is necessary to achieve the purpose and to what extent it is necessary. Anonymous or statistical data may be used where the purpose is acceptable and proportionate.

#### **e. Deletion of personal data**

Personal data which is no longer necessary after the expiry of the time periods required for record retention obligations and proof-related record keeping transactions as provided in the relevant laws, will be deleted or destroyed or anonymized.

**f. Accuracy and data up-to-datedness**

If the personal data is correct, complete and known, it must be updated. Inaccurate or incomplete data should be deleted, corrected, completed or updated.

**g. Privacy and data security**

Personal data should be stored and kept as confidential information. Personal Data should be protected and kept confidential on a personal level by taking necessary administrative and technical measures to prevent unauthorized access, illegal transactions, sharing, accidental loss, alteration or destruction.

**V.Purposes of personal data processing**

Collection and processing of personal data will be carried out within the scope of the Disclosure Text and the following purposes.

**a. Data of customers and business partners**

- **Data processing for contractual relationship:** Personal data of existing and potential customers and business partners (in case the business partner is a legal entity, the official of the business partner) can be processed for the establishment, implementation and termination of a contract without any further approval. Before entering into, and at the beginning of, any contract, personal data can be processed to prepare offers, purchase orders or to meet the data subject's requests for the implementation of the contract. Data subjects can be contacted in the light of the information they have provided during the contract preparation process.
- **Data processing for advertising purposes:** Personal data is processed for advertising or market and public opinion research only if the purpose of collecting this data fits for those purposes. Data subjects are informed that their data will be used for advertising purposes. Data subjects may refrain from giving their data for which they have been informed that it will be used for advertising purposes or consenting the same to be processed. Explicit consent of the data subject is required for data processed for advertising purposes. The data controller will be able to obtain the explicit consent of the data subject in this direction by electronic confirmation, mail, electronic mail or telephone. The use of personal data for advertising purposes without the explicit consent of the data subject is prohibited.
- **Data transactions performed due to our legal obligations or clearly provided for in law:** Personal data may be processed without any further approval, if the processing is clearly stated in the relevant legislation or in order to fulfil a legal obligation provided for in the legislation. The type and scope of data processing must be necessary for the legally permitted data processing activity and comply with the relevant legal provisions.
- **Legitimate interest principle for the processing of personal data:** Personal data can be processed without any further approval, if it is necessary for a legitimate interest of Remik Kimya. Legitimate interests are generally legal interests.

- **Processing of personal data of special nature:** Personal Data of Special Nature are processed within the framework of the provisions of the PDPL and provided that adequate measures to be determined by the Board are taken. Personal Data of Special Nature belonging to the data subject other than those related to health and sexual life are processed within the scope of the express consent of the data subject and in the absence of express consent, within the scope of the exceptions provided for in the PDPL. Personal Data of Special Nature of data subjects related to health and sexual life can only be processed by persons or authorized institutions and organizations under the obligation of secrecy, for the purposes of protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, in the absence of express consent of the person concerned.
- **Data processed exclusively through automated systems:** The processing of personal data obtained through automated systems will not make it justified and lawful to use this data in any affairs and processes that adversely affect the personal data subject. The personal data subject has the right to object to the emergence of any consequence against himself/herself through the analysis of the data processed exclusively by means of automated systems. At the request of the personal data subject, Remik Kimya will endeavour to take the necessary measures.
- **User information and internet:** In the event that personal data is collected, processed and used in websites or applications, users who have personal data should be informed about the use of the data they save on the site, privacy statement, and cookies. The privacy statement and cookie details are integrated so that they can be easily identified, directly accessible and continuously available for the person concerned.

#### **b. Principles regarding the processing of personal data of employees**

It is obligatory to collect and process personal data of the employees in the process until the establishment, implementation and termination of the employment contract. No further express consent may be obtained from the employees for the same. Personal data of potential employee candidates is also processed in job applications. In case of rejection of the candidate's job application, the personal data obtained during the application is retained for the next election stage for the appropriate data retention period and at the end of this period, deleted, destroyed or anonymized. The following principles should be considered in the processing of personal data of employees.

- **Data transactions clearly provided for in law and carried out due to legal obligations:** Personal data of employees may be processed without any further approval, if the processing is clearly stated in the relevant legislation or in order to fulfil a legal obligation provided for in the legislation.
- **Processing of data in accordance with legitimate interest:** In cases where Remik Kimya has a legitimate interest, personal data of employees can be processed without any further approval. Legitimate interests are generally legal or economic interests. In personal situations where employee interests are to be

protected, personal data will not be processed for legitimate interests. It is determined whether there are interests that require protection before the data is processed. If personal data of employees is processed based on the legitimate interests of Remik Kimya, it should be examined whether this processing is proportionate and whether the legitimate interest violate any right of the employee that must be protected.

- **Processing of personal data of special nature:** Special categories of personal data are processed only under certain conditions. Special categories of personal data refer to data on race, ethnic origin, political thought, philosophical belief, religion, sect or other beliefs, costume and attire, membership to any association, foundation or trade union, health, sexual life, criminal conviction and security measures and biometric and genetic special categories **data**. Special categories of personal data can only be processed if the employee has given his/her express consent and by taking the necessary administrative and technical measures. The following cases are the exceptions to this provision, and personal data of special nature may be processed even in the absence of express consent of the employee concerned.
  - Processing of Personal data of Special Nature other than those related to health and sexual life of the employee, in cases provided for in the law,
  - Processing of Personal data of Special Nature of employees related to health and sexual life only by persons or authorized institutions and organizations under the obligation of secrecy, for the purposes of protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.
- **Data processed exclusively through automated systems:** If the personal data of the employee is processed exclusively through automated systems as part of a business relationship, the employee has the right to object to the emergence of any consequence against himself/herself or any consequence arisen due to the use of such data.
- **Telecommunications and internet:** Telephone equipment, e-mail addresses, internal networks and intranet and internet are provided by Remik Kimya primarily for business related tasks. These are working tools and Remik Chemistry resources. These tools should be used in accordance with legal regulations and Remik Kimya internal regulations. There is no general monitoring of telephone and e-mail communication or intranet and internet use. In order to prevent attacks against IT infrastructure or individual users, protective measures are taken in the transition to the Remik Chemistry network to block technically harmful contents or analyse the modelling of the attacks. The use of telephone equipment, e-mail addresses, intranet / internet and/or social networks within the Company is kept for a limited time for security reasons. Individual evaluations of these data are made only if there is a concrete suspicion. These controls are carried out by the relevant departments only on condition that the principle of proportionality is adhered.

- **Access Prohibition:** Remik Kimya exercises maximum effort to process, protect and preserve personal data, collected pursuant to its legal obligations, legitimate interests and open consent of its employees, in accordance with their purposes of collection, and shares personal data only with relevant employees. Employees will be held personally liable for any works they have carried out within the scope of their job descriptions and any transactions they have carried out related to access permit and unrelated personal data without the express written authorization of Remik Kimya and accordingly, legal measures will be taken. For this reason, employees should be provided with regular training on not disclosing and sharing personal data illegally, and a disciplinary process should be established that will be commissioned in case employees fail to comply with security policies and procedures.

## **VI. Transfer of personal data**

The transfer of personal data to a third-party other than Remik Kimya will be carried out within the scope of the purposes set out in the Enlightenment Text and below. Accordingly, Remik Kimya will be able to transfer personal data to the individuals and organizations listed below for certain purposes;

- to Remik Kimya business partners being limited to ensuring the fulfilment of establishment purposes of the business partnership;
- to the suppliers of Remik Kimya, from which Remik Kimya outsource the products and services necessary to carry out its commercial activities;
- to Remik Kimya subsidiaries being limited to ensuring the execution of commercial activities that require the participation of Remik Kimya subsidiaries;
- to Remik Kimya shareholders being limited to the design of strategies related to the commercial activities of Remik Kimya and audit purposes, in accordance with the provisions of the PDPL;
- to legally authorized public institutions and organizations being limited with the purpose required by the relevant public institutions and organizations within their legal powers;
- to legally authorized private law persons being limited with the purpose required by the relevant private law persons within their legal powers.

Your personal data processed by Remik Kimya will be transferred to foreign countries after these countries have been announced by the Board with sufficient protection. Personal data can be transferred to countries and regions with no sufficient protection announced only if the data subject consents to the transfer or only if the data controllers in the relevant foreign country undertakes a sufficient protection in writing and the Board approves the transfer. Remik Kimya can also use cloud storage service in processing of your personal data.

## **VII. Rights of data subjects**

Personal data subjects have the following rights;

- to find out whether their personal data has been processed;
- if their personal data has been processed, to request information related thereto;

- find out the purpose of processing of their personal data and whether or not their personal data is used properly;
- know about third-parties to whom their personal data is transferred home or abroad;
- in case personal data is processed incompletely or incorrectly, to request for correction of their personal data and for notification of such correction to third-parties to whom their personal data is transferred;
- in case of disappearance of the grounds that require processing of their personal data although processed in accordance with the provisions of the PDPL and other relevant law, to request for deletion or destruction of their personal data and for notification of such deletion or destruction to third-parties to whom their personal data is transferred;
- to object to the emergence of any consequence against themselves through analysis of the data processed exclusively by means of automated systems;
- if they suffer any loss and/or damage due to the unlawful processing of their personal data, to claim indemnification of losses and/or damages they have suffered;

and Remik Kimya receives any such request, Remik Kimya must respond to the request within the relevant period of time. For this reason, Remik Kimya will provide the necessary information to data subjects about the use of the rights mentioned above and the way in which the requests are evaluated.

Exceptions to the above rights granted to personal data subjects in the PDPL are listed below, and in these cases, Remik Kimya is not obliged to answer requests from data subjects:

- processing personal data for purposes, such as research, planning and statistics, by making them anonymous with official statistics;
- processing of personal data for art, history, literature or scientific purposes or within the scope of freedom of expression, provided that they do not violate national defence, national security, public security, public order, economic security, privacy or personal rights, or constitute a crime;
- 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 defence, national security, public security, public order or economic security;
- processing of personal data by judicial authorities or enforcement authorities regarding investigations, prosecutions, trials or enforcement proceedings.

Pursuant to the PDPL, the relevant persons cannot claim their other rights other than the right to claim compensation for their damages in the following situations:

- personal data processing is necessary for the prevention of crime or criminal investigation;
- processing by the personal data subject of the personal data anonymized by the data subject himself/herself;
- personal data processing is necessary for the execution of auditing or regulation duties by authorized public institutions and organizations and professional

institutions, which in nature are public institutions, based on the power granted by the law, and for disciplinary investigations or prosecutions;

- personal data processing is necessary for the protection of the State's economic and financial interests in relation to budget, tax and financial matters.

Personal data subjects can exercise their rights listed above after completing and signing the Personal Data Application Form in our website available at [www.remikkimya.com](http://www.remikkimya.com) and [www.remikkimya.com.tr](http://www.remikkimya.com.tr) and sending the original copy to Esenler Mahallesi Kahramanlar Caddesi, No:71, 34899, Pendik/Istanbul together with their photocopies, either by hand or by registered mail. In applications to be made on behalf of a person other than the personal data subject himself/herself, the personal data subject must have a power of attorney duly issued by the relevant right holder. Remik Kimya may request additional information from the relevant person in order to determine whether the applicant is the personal data subject, and may ask the personal data subject questions regarding his/her application in order to clarify the matters specified in the application.

Based on the nature of the request, Remik Kimya shall finalize the request free of charge as soon as possible and within 30 (thirty) days at the latest.

## **VIII. Confidentiality**

Personal data is subject to privacy. Employees are prohibited from collecting, processing or using data without permission. Unauthorized use is unauthorized data processing that employees perform outside their legitimate duties. The know-principle applies: Employees can access personal data only if it is related to the scope and nature of the task in question.

Employees are prohibited from using personal data for private or commercial purposes, distributing it to unauthorized persons or making it otherwise accessible. Managers must inform their employees of the obligations associated with data protection when the business relationship begins. This obligation shall survive even after the termination of the business relationship.

## **IX. Security**

Remik Kimya takes the necessary measures and controls to provide appropriate level of security in order to prevent the unlawful processing of the personal data it processes, to prevent illegal access to the data and to ensure the protection of the data, and conducts, or causes to be conducted, audits necessary in this context. This applies regardless of whether data processing is carried out electronically or in writing. Technical and organizational measures for the protection of personal data are defined and implemented, especially before starting new methods of data processing in transition to new IT systems. These measures are based on the latest developments, the risks of the transaction and the need for data protection, which is determined by the information classification process. Technical and organizational measures for the protection of personal data are part of the Company's information security management and are constantly adapted to technical developments and organizational changes.

## **X. Controls and Audits**

Compliance with the Personal Data Protection and Processing Policy and the PDPL is ensured through regular data protection audits and other controls.

## **XI. Data breach management**

Remik Kimya will immediately take the necessary security measures for the protection of personal data obtained in violation of this Policy and the provisions of the PDPL and will notify the same to the relevant person and the Board as soon as possible. For this purpose, it is the responsibility of Remik Kimya to establish systems and application methods that enable personal data subjects to submit their requests and complaints regarding their personal data in the most effective and short time. If deemed necessary by the Board, this may be announced on the Board's website or by any other method.

## **XII. Obligation to register with the data controllers' registry**

Remik Kimya has been registered to the Data Controllers Registry as specified in Article 16 of the PDPL. Accordingly, the information and documents submitted to the Board for registration are as follows:

- Identity and address details of Remik Kimya, as the data controller, and its representative, if any;
- purposes for which personal data will be processed;
- explanations on group(s) of data subjects and data categories of such data subjects;
- recipients or recipient groups to which personal data can be transferred;
- personal data allowed to be transferred to foreign countries;
- measures taken for personal data security;
- maximum time period required for the purpose for which personal data are processed.