

PERSONAL DATA PROTECTION AND PROCESSING POLICY

1. INTRODUCTION

For **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** as a data controller, the protection of personal data belonging to 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 and the targeted purpose managed by this Policy and other written policies within the body of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**, is the legal processing and protection of the personal data of our customers, potential customers, employees, employee candidates, visitors, employees of the institutions we cooperate with, employees of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** and third parties.

In this context, necessary administrative and technical measures are taken by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** for the processing and protection of personal data in accordance with the Law No. 6698 and the relevant legislation.

In this Policy, the following basic principles adopted by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** for the processing of personal data will be explained:

- Processing of personal data within the scope of consent,
- Processing of personal data in accordance with the law and good faith,
- Keeping personal data accurate and up-to-date when necessary,
- Processing personal data for specific, clear and legitimate purposes,
- Connected, limited and measured processing of personal data for the purpose for which they are processed,
- Retaining Personal Data for the Period Required for the Purpose stipulated in the Legislation or for the Purpose for Which They were Processed,
- Informing personal data owners,
- Forming the necessary infrastructure for personal data owners to exercise their rights,
- Taking necessary measures to protect personal data,
- Acting in accordance with the relevant legislation and the regulations of the KVK (the protection of personal data) Board in determining and applying the processing purposes of personal data, transferring them to third parties
- Special arrangement of the processing and protection of sensitive 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 in accordance with the law by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** and the systems adopted for the protection of personal data, to provide transparency by informing our customers, employees, employee candidates, visitors, shareholders and employees of the institutions we cooperate with, and third parties in this context.

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 by non-automatic means provided that they are part of any data recording system.

4. ISSUES ON THE PROTECTION OF PERSONAL DATA

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. takes the necessary technical and administrative measures to ensure the appropriate security level in order to prevent the illegal processing of the personal data it processes, unlawful access to the data and to ensure the protection of the data, in accordance with Article 12 of the KVK (the law on the protection of personal data) Law and the necessary inspections are made or made in this context.

4.1. Measures Taken to Ensure the Legal Processing Of Personal Data

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. takes technical and administrative measures according to technological possibilities and application costs to ensure that personal data are processed legally.

4.1.1. Technical Measure

The main technical measures taken by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** to ensure the legal processing of personal data are listed below:

- Personal data processing activities carried out within **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** are audited by established technical systems.
- The technical measures taken are periodically reported to the relevant person in accordance with the internal audit mechanism.
- Departments have been established on technical issues, knowledgeable personnel are employed and support is also received from consultants.

4.1.2. Administrative Measures

Administrative measures taken by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** for legal processing of personal data:

- Employees of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** are informed and educated about the law on protection of personal data and the processing of personal data in accordance with the law.
- All personal data processing activities carried out by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** are carried out in accordance with the personal data inventory and its annexes created by analyzing all business units in detail.
- Personal data processing activities carried out by the relevant departments within **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** and the liabilities to be fulfilled to ensure that these activities comply with the personal data processing requirements of KVKK issued to written policies and procedures by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** and each business unit has been informed about this issue and the specific issues to be taken into account have been determined.
- The supervision and management of the departments within **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** regarding personal data security are organized by the Information Security Committees. Awareness is created in order to meet the legal requirements determined on the basis of the business unit, and the necessary administrative measures are implemented through in-house policies, procedures and trainings to ensure the supervision of these issues and the continuity of the implementation.
- The service contracts and related documents between **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** and the employees are recorded and additional protocols are made including information about personal data and data security. Efforts have been made to create the necessary awareness for employees on this issue.

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. conducts Privacy Impact Analysis assessment in the following cases:

- In new projects involving personal data
- Before selecting the supplier to whom personal data are transferred
- Before the activities to be carried out within the scope of marketing activities
- In case of any change in the above-mentioned activities

Privacy Impact Analysis is subject to the approval of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**'s Data Protection Officer.

4.1.3. Technical and Administrative Measures to Prevent Unlawful Access to Personal Data

In order to prevent the disclosure, access, transfer of personal data by imprudence or by unauthorized persons, data leaks in the systems of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** or any other unlawful access **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** takes technical and administrative measures according to the class, quality, technological possibilities and application costs of the data to be protected.

4.1.4 Technical Measures

The main technical measures taken by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** to prevent unlawful access to personal data are listed below:

- New technological developments are followed and technical measures are taken on systems, especially in the field of cyber security, the measures taken are periodically updated and renewed.
- Access and authorization technical solutions are put into use within the framework of legal compliance requirements specified in each department within the body of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**
- Access authorities are restricted and authorities are regularly reviewed. Access restrictions are imposed on former employees and accounts are closed.
- Technical measures taken in line with the operation of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** are reported to the relevant users, and the necessary technological solutions are produced by re-evaluating the risks.
- Software and hardware including virus protection systems, data vulnerability security and firewalls are installed.
- Support is received on technical issues.
- All information systems, including the applications where personal data are collected, are regularly subjected to external impact tests to detect security gaps and the gaps found according to the results of this test are closed.

4.1.5. Administrative Measures

- Employees are trained on administrative measures to be taken to prevent illegal access to personal data.
- Considering the personal data processing processes, legal compliance, access to personal data and authorization processes within the company are applied for each department within the body of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**
- the contracts signed between **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** and the employees, the scope of the legal personal data processing activity is explained and there are commitments to comply with these issues.

- An additional contract is made by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**, which includes provisions that the persons to whom the personal data are legally transferred and the persons to whom the personal data is transferred will take the necessary security measures in order to protect the personal data and ensure that these measures are followed in their own organizations.

4.2. Audit of Measures Taken on Personal Data Protection

There is a Personal Data Privacy Manager within **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** Personal Data Privacy Manager personally carries out the necessary inspections in the institution or organization in order to ensure the implementation of the provisions of the Law on behalf of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**, which is the data controller, and has it done by getting support from competent organization. According to the results of this audit, detected violations, negativities and non-conformities are reported to the Information Security Management Representative, and the Information Security Management Representative takes the necessary measures regarding these issues. In case of receiving an external service by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** due to technical requirements regarding the storage of personal data, additional agreements are made with the relevant companies to whom the personal data are transferred in accordance with the law and the persons to whom the personal data is transferred will take the necessary security measures in order to protect the personal data and that these measures will be followed in their own organizations.

5. RIGHTS AND REQUESTS OF THE PERSONAL DATA OWNER

For applications that do not meet the Personal Data Application and Response Procedure, which is an annex to the personal data inventory, and the application conditions specified in the law, **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** has established the procedures for referring to the written template as the data controller against the requests of the related person in accordance with Article 13 of the KVK Law. Technical preparations have been made in order to carry out the necessary actions in accordance with these procedures. There is a systematic infrastructure within the body of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** to ensure the implementation of this procedure.

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. will respond to the request free of charge within thirty days at the latest, depending on the nature of the request by submitting ID, by personal application, in writing or by registered electronic mail (KEP) address, secure electronic signature, mobile signature or by the person concerned, the requests of personal data owners previously notified to **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** regarding their rights listed below and using the electronic mail address registered in the system of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** by using a software or application developed for application purposes. Detailed explanation on this issue is provided below in article 20 of this policy.

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

6. PROTECTION OF SENSITIVE PERSONAL DATA

With the KVK Law, special importance has been attributed to the risk of causing personal injury or discrimination when certain data is processed illegally. These data are the personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions and security measures, and the biometric and genetic data.

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. acts sensitively in the protection of personal data of special nature, which are determined as "special quality" by KVK Law and processed in accordance with the law. In this context, the technical and administrative measures taken by **İntermak Matbaa Ve Tekstil Makinaları**

San. Ve Tic. Ltd. Şti. for the protection of personal data are carefully applied in terms of special quality personal data and the necessary inspections are provided by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**

In this context, due to the workplace doctor service provided by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**, the health data of the employees are processed and the necessary trainings are given to the personnel who can access this special quality personal data and the scope and duration of the access authorization of these personnel are determined, audits are carried out periodically and confidentiality agreements are signed. In case the relevant personnel leave their job, their access authorization is immediately removed.

Physical files containing personal health data physically stored in employees' health files are kept in locked areas and accessible only to authorized personnel. No unit other than authorized personnel can access employee health data.

7. TRAINING OF İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.'s EMPLOYEES ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. provides its employees with the necessary trainings in order to prevent the illegal processing of personal data, to prevent unlawful access to the data and to increase the awareness of data protection.

8. ISSUES RELATED TO THE PROCESSING OF PERSONAL DATA

Regarding the processing of personal data in accordance with Article 20 of the Constitution and Article 4 of the KVK Law, **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** conducts personal data processing activities in accordance with the law and the rules of honesty, accurate and when necessary, up-to-date, specific, explicit and legitimate purposes, in a purposeful, limited and measured manner. **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** preserves personal data for the period stipulated by law or as required by the purpose of personal data processing. **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**, its customers, employees, visitors, supplier company employees and third parties personal information, identity information (name, surname, TR identity number, gender, age, date of birth), contact information (e Personal data such as -mail address, telephone number, address information, IP address), vehicle information, occupational data, visual and audio data, education data, family data, health data are processed and while processing these data, the personal data owners listed here can benefit effectively from the services of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**, improve the variety of services, provide services with the principle of "best service" for its customers and be informed about marketing and innovations as a result of these services, as well as execution, execution of the work and financial/legal/commercial obligations.

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. enlightens the data owners in accordance with Article 10 of the KVK Law and requests the consent of the data owners in cases where consent is required, and processes these personal data based on the following criteria.

8.1. Processing in compliance with the Rule of Law and Good Faith

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. acts in accordance with the principles of legal regulations and general trust and honesty in the processing of personal data. In accordance with the principle of compliance with the principle of honesty, **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** takes into account the interests and reasonable expectations of the relevant persons while trying to achieve its goals in data processing.

8.2. Ensuring Personal Data Accuracy and Up-to-Dateness When Necessary

Keeping personal data in an accurate and up-to-date manner is necessary for **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** to protect the fundamental rights and freedoms of the person concerned. **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** has an active diligence obligation to ensure that

personal data are accurate and up-to-date when necessary. For this reason, all communication channels are open by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** in order to keep the information of the data owner in an accurate and up-to-date manner.

8.3. Processing with Specific, Explicit and Legitimate Purposes

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. clearly and precisely determines the purpose of processing personal data that is legitimate and legal. *Sağlam Metal A.Ş.* processes personal data in connection with the commercial activity it carries out and as much as necessary for them.

8.4. Being Limited, Proportional and Expedient to Purpose of Data Processing

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. processes personal data within the scope of the purposes that are related to its field of activity and necessary for the execution of its business. For this reason, **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** processes personal data in a way that is convenient for the realization of the specified purposes and avoids the processing of personal data that are not related to the realization of the purpose or are not needed. For instance, personal data processing activity is not carried out to meet the needs that may arise later.

8.5. Maintaining for the Time Required for the Purpose Foreseen in the Relevant Legislation or for the Purposes for which It Is Being Processed

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. retains personal data only for the period specified in the relevant legislation or for the purpose for which they are processed. In this context, **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** firstly determines whether a period is stipulated for the storage of personal data in the relevant legislation, if a period is specified, it acts in accordance with this period, if a period is not specified, it stores the personal data for the period required for the purpose of processing and specified in the law. **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** is based on the retention periods in the personal data inventory, and at the end of the periods specified here, personal data are deleted, destroyed or anonymized according to the obligations under the Law, according to the nature of the data and the purpose of use.

9. DISCLOSURE AND INFORMING THE PERSONAL DATA OWNER

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. enlightens the personal data owners during the acquisition of personal data in accordance with Article 10 of the KVK Law. In this context, **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** provides clarification according to the nature of the data owner and the data processing process regarding the identity of the data controller, the identity of its representative, if any, the purpose for which the personal data will be processed, to whom and for what purpose the processed personal data can be transferred, the method of personal data collection and the legal reason and the rights of the personal data owner. In this context, Clarification Texts are placed on the website and in the office so that customers can easily see them. Along with this policy, the customer clarification text, cookie policy and application form have also been published on the website of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**

10. TRANSFER OF PERSONAL DATA

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. can transfer personal data and special quality 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. In the absence of adequate protection to foreign countries declared by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** as having adequate protection by the KVK Board, personal data can be transferred to foreign countries where the data controllers in the country and in the relevant foreign country undertake an adequate protection in writing and have the permission of the KVK Board. The transfer reasons are explained below:

- If there is a clear regulation about transfer of personal data by law,

- If it is necessary to transfer 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 **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** to fulfill its legal obligation,
- If personal data transfer is mandatory for the establishment, exercise or protection of any right,
- If personal data transfer is mandatory for the legitimate interests of Sağlam Metal A.Ş., provided that it does not harm the fundamental rights and freedoms of the personal data owner.

11. PERSONAL DATA INVENTORY AND CLASSIFICATION OF PERSONAL DATA OF İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.

Before **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**, in line with the legitimate and legal personal data processing purposes of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**, based on and limited to one or more of the personal data processing conditions specified in Article 5 of the KVK Law, especially the principles specified in Article 4 regarding the processing of personal data, personal data in the following categories are processed by informing the relevant persons complying with the general principles specified in the KVK Law and all obligations regulated in the KVK Law and limited to personal data owners (customers, employees, visitors, third parties, employee candidates, employees of the institutions we cooperate with) within the scope of this Policy.

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. has created a personal data inventory in accordance with the Data Controllers Registry Regulation issued by the Personal Data Protection Authority. This data inventory includes data categories, source of data, data processing purposes, data processing process, recipient groups to which data is transferred and storage periods. In this context, the following types of data categories are included in the personal data inventory of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**

PERSONAL DATA CATEGORIZATION	PERSONAL DATA CATEGORIZATION STATEMENT
Contact Data	It is a data group that can be used to reach the person (Phone, address, e-mail, Fax number, IP address).
Identity Data	It is the data group that contains information about the person's identity (Name, surname, Turkish ID number, mother's name, father's name, place of birth, date of birth, gender, wallet serial number, identity copy, tax number, sgk number, nationality data, marriage certificate card).
Health Data	It is the data group containing the health information of the person (blood type, medical history, check-up result, consultation report, diet form).
Vehicle Data	It is the data group containing the vehicle information of the person (license plate number, chassis number, engine number, license information).
Location Data	It is the data group that contains the location data of the person (GPS location).
Visual and Audio Data	It is a data group containing visual and auditory data of the person (Photo, sound recording, camera recording, driver's license photocopy/scan, ID photocopy/scan, passport photocopy/scan).
Digital Trace Data	It is a data group (Log) containing digital traces formed as a result of the processing of personal information.
Financial Data	It is the data group containing the financial information of the person (Bank account number, IBAN number, card information, bank name, financial profile, mail order form, credit note)
Biometric/Genetic Data	It is a data group containing personal biometric/genetic data (Fingerprint, genetic information, vein print).
Occupational Data	It is the data group that contains information about the occupation of the person (information about the institution he/she works for, trade association registry).
Education Data	It is the data group containing education data of the person (Diploma grade, diploma photocopy/scan).
Asset Data	It is the data group that contains the assets owned by the person (title deed photocopy/scan, vehicle license photocopy / scan).

Travel Data	It is the data group that contains information about the person's travels (flight information, flight card, tour route, mileage card number, accommodation data).
Company Data	Personal company data (Company address).
Race/Religion Knowledge	It is a data group containing data on the origin and belief of the person (race/religion information).
Association membership information	It is the data group that contains the information about the member and association of the person (All association memberships).
Signature Data	It is the data group containing signature information of the person (wet signature, e-signature, signature photocopy/scan).
Visa/Passport Data	It is the data group containing the visa/passport information of the person (Visa information, passport photocopy/scanning).
Appearance Data	It is a data group that includes the distinguishing features of a person's clothing (Clothing purchase history, distinctive clothing worn).
Sanction Data	It is the data group regarding the sanctions taken in the past of the person (Criminal Prosecutions, Criminal Records, Disciplinary Record).

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti., has completed the data classifications in line with the ISMS Assets Determination, Classification and Protection Instruction, and the Destruction Instruction and determined the storage periods with their justifications, as shown in the table above in the Personal Data Inventory of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**, which is created based on the data types used within the scope of data processing activities and within the company.

12.PURPOSES OF PERSONAL DATA PROCESSING

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. processes personal data limited to the purposes and conditions within the terms of personal data processing specified in Article 5, paragraph 2 and Article 6, paragraph 3 of the KVK Law. These purposes and conditions are:

- To promote services to customers, to inform them,
- To carry out studies to improve service quality and to provide better service,
- To issue invoices for our services,
- To outsource services,
- To offer the benefits of expert organizations to customers in order to receive services in subjects that are not within their field of expertise and to receive technology services,
- To confirm identity,
- To answer questions and complaints,
- To take necessary technical and administrative measures within the scope of data security,
- Financial agreement on the products and services offered with the relevant business partners and other third parties,
- Provision of necessary information in accordance with the demands and audits of regulatory and supervisory agencies and official authorities,
- To preserve information on data that should be kept in accordance with the relevant legislation,
- To provide control over the consistency of information,
- To measure customer satisfaction,
- In terms of employees, to create a personal file, to determine whether they are capable of fulfilling the requirements of the job continuously, to make private health insurance, to create a health file, to take occupational safety measures,

- To use the data obtained through the website or social media channels for marketing purposes through third party agencies,
- To fulfil legal obligations,
- Execution/follow-up of financial reporting and risk management processes of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**,
- Execution/follow-up of legal affairs of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**,
- To create and monitor visitor records.

13.RETENTION PERIODS OF PERSONAL DATA

In case it is stipulated in the relevant laws and regulations, **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** keeps 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 are kept for the period required to be kept in accordance with the practices of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** and the industry practices depending on the activity carried out by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** while processing that data, then, in accordance with the nature of the data, it is deleted, destroyed or anonymized in accordance with the relevant policy established by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**

If the purpose of processing personal data has expired, and the retention periods determined by the relevant legislation and **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** have also come to an end, personal data can only be stored in order to provide evidence in possible legal disputes or to assert the relevant right related to personal data or to establish a defence. Despite the expiration of the time-out periods and the time-out periods for the right to be claimed in the establishment of the periods here, storage periods are determined based on the examples made in the previous requests made to **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** In this case, retained personal data are not accessible for any other reason except for the requirements of legal disputes. Personal data is deleted, destroyed or anonymized once the mentioned period has expired.

14. THIRD PERSONS TO WHICH PERSONAL DATA IS TRANSFERED BY **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** and THE PURPOSE OF TRANSFER

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. notifies the personal data owner the groups of persons to whom personal data are transferred in accordance with Article 10 of the Law on KVK.

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti., can transfer the personal data of data owners managed by this Policy to the following stakeholder categories **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** in accordance with Articles 8 and 9 of KVK Law:

- Business partners of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**,
- Bank and insurance companies
- Travel agencies
- Institutions and organizations providing healthcare services to employees
- Hotels
- Training firms
- Suppliers of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**,
- Company officials of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**,

- Legally authorized public institutions and organizations,

The transfer scope and data transfer purposes are as follows:

Persons for Data Transfer	Definition	Purpose of Data Transfer
Business Partner	It defines the parties that İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. has established business partnerships with for purposes such as carrying out various projects and obtaining services while conducting its commercial activities.	In order to ensure the fulfillment of the objectives of the establishment of the business partnership, it is transferred in a limited way.
Supplier	While carrying out the commercial activities of İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. , in compliance with the orders and instructions of İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. , it defines the parties that offer services to İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. on a contract basis.	The services provided by İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. externally from the supplier and the services required to fulfill the commercial activities of İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. are limited in order to provide İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.
Authorized Public Institutions and Organizations	It defines the authorities and organizations authorized to receive information and documents from İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.	In cases where public institutions and organizations request and provide a legal basis, it is transferred for a limited purpose.

15.PROCESSING PERSONAL DATA

15.1. Processing of Personal Data

The explicit consent of the personal data owner is only one of the legal bases 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 can be only one of the following conditions, and more than one of these conditions may be the basis of the same personal data processing activity.

Processing Conditions	Scope	Example
Law provision	Tax Legislation, Labor Legislation, Trade Legislation etc.	Personal information of the employee must be kept in accordance with the legislation.
Performance of the Contract	Employment Contract, Sales Contract, Transport Contract, Work Contract etc.	Saving the company's address information for delivery.
Actual Impossibility	A person who cannot give consent or does not have discrimination due to actual impossibility.	Contact or address information of the unconscious person. Location information of a kidnapped person.
Legal Liability of the Data Controller	Financial Audits, Security Legislation, Compliance with Sector Oriented Regulations.	Sharing information during special audits in areas such as Banking, Energy and Capital Markets.
Gaining Publicity	The relevant person submitting the information to the public.	The person declaring his/her contact information to be reached in case of emergency.
Establishment, Protection and Use of Right	Filing lawsuits, registration procedures, all kinds of title deed transactions, etc. mandatory data to be used in jobs.	Keeping the necessary information of an employee who left the job during the time limit of the case.

Legitimate interest	Provided that the fundamental rights of the data owner are not harmed, the data can be processed if it is necessary for the legitimate interest of the data controller.	Data processing to apply rewards and bonuses that increase employee loyalty.
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16. İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. SERVICE BUILDING ENTRANCES AND PERSONAL DATA INSIDE THE BUILDING

In order to ensure security, **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** conducts personal data processing activities for monitoring guest entrances and exits with security cameras in the buildings of **İntermak Matbaa Ve Tekstil Makinaları San.**

Personal data processing is carried out by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** by using security cameras and recording guest entrance and exit.

Within the scope of surveillance activity with security camera, **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** aims to protect the interests of the company and other persons regarding their security. 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 about the camera monitoring is announced to all employees and visitors and people are enlightened. Notification letters are hung at the entrances of the areas where the monitoring is done. Necessary technical and administrative measures are taken by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** in accordance with Article 12 of the KVK Law to ensure the security of personal data obtained as a result of camera surveillance.

16.1. Follow-up of Guest Entry and Exits at **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** Service Building Entrances and Inside

For the purpose of ensuring security by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** and for other purposes specified in this Policy, **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** carries out personal data processing activities for the tracking of guest entrance and exit of service building. While obtaining the identity data of persons who come to the company's service buildings as guests, or through texts posted in **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** or made available to the guests in other ways, the personal data owners in question are enlightened within this scope. The data obtained for tracking guest entrance and exits are processed for this purpose only, and the personal data are recorded in the data recording system in physical domains.

16.2. Storage of Records Regarding Internet Access Provided to Visitors in **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** Service Building

For the purpose of ensuring security by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** and for other purposes specified in this Policy, visitors who request internet access can be provided during their stay in the buildings and facilities. In this case, the log records of internet access are kept in accordance with the Law No. 5651 and the governing provisions of the legislation regulated according to this Law, these records are processed only if requested by the authorized public institutions and organizations or in order to fulfil the relevant legal obligation in the audit processes to be carried out within **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**

17. DISPOSAL OF PERSONAL DATA (DELETION, DESTRUCTION AND ANONYMIZATION)

In accordance with Article 138 of the Turkish Penal Code, Article 7 of the KVK Law and the "Regulation on Deletion, Destruction and Anonymization of Personal Data" issued by the Board, although it has been processed in accordance with the provisions of the relevant law, in the event that the reasons for its processing disappear, the personal data will be deleted, destroyed or anonymized upon the decision of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** or upon the request of the personal data owner. **İntermak Matbaa Ve Tekstil**

Makinaları San. Ve Tic. Ltd. Şti. has created a policy on this subject 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, a Disposal Instruction has been created by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** within the scope of ISMS, and periodic destructions are carried out at various intervals with the commencement of the obligation.

18. RIGHTS OF PERSONAL DATA OWNERS, EXERCISE OF THESE RIGHTS

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. informs itself about the rights of the personal data owner in accordance with Article 10 of the KVK Law, and it guides the personal data owner on how to use these rights regulated in Article 11. **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** carries out the necessary channels, internal processes, administrative and technical regulations 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.

18.1. Data Owner's Rights and Exercises of These Rights

18.1.1. Rights of Personal Data Owner

Personal data subjects have the following rights:

- a. To find out whether his/her personal data are processed,
- b. to request information if his/her personal data are processed,
- c. to learn the purpose of his/her data processing and whether this data is used for intended purposes,
- d. To know the third parties to whom his/her personal data is transferred at home or abroad,
- e. if the personal data is processed incompletely or incorrectly, request correction thereof and, in this extent, request notification of the same to the third persons to whom the personal data have been transferred,
- f. To request deletion or destruction of personal data in case the reasons necessitating their processing cease to exist, despite personal data has been processed in accordance with Law and relevant other law provisions, and to request notification of the operations made within this context to third parties to whom your personal data has been transferred,
- g. To object to this result in the event of a result against the person himself by analysing the processed data exclusively through automated systems,
- h. To claim compensation in case of suffering loss due to illegal processing of the personal data

18.1.2. Situations where Personal Data Owner Cannot Claim his/her Rights

Personal data owners cannot claim their rights listed in 20.1.1., as the following cases are excluded from the scope of KVK Law in accordance with Article 28 of the KVK Law:

- a. Processing the personal data for the purposes of investigation, planning and statistics by anonymizing with official statistics,
- b. Processing personal data within the context of artistic, historical, literary or scientific purposes or freedom of speech provided that the personal data does not breach the natural defence, national security, public security, public order, economic security and confidentiality of private life or personal rights, and does not constitute a crime,

c. Processing the personal data within the scope of preventive, protective and intelligence operations executed by state institutions and organizations so authorized by the law to ensure national defence, national security, public safety, public order or economic security,

d. Processing the personal data by judicial or enforcement authorities in relation to the investigation, proceedings, litigation or execution procedures.

In accordance with Article 28/2 of the KVK Law, personal data owners cannot claim their other rights listed in 20.1.1, except the right to demand compensation for the damage in the following cases:

a. Processing personal data being required for prevention of committing an illegal act or criminal investigation,

b. Processing of personal data publicized by the personal data subject,

c. Processing personal data being required for disciplinary investigation or prosecution and conducting supervisory or regulatory duties by the authorized public institutions and organizations and professional public organizations by the power granted by the law,

d. Processing personal data being required for protecting economic and financial interest of the State in relation to the budget, tax and financial matters.

18.1.3. Personal Data Owner Exercising his/her Rights

With the information and documents that will determine the identity of the requests regarding the rights specified in this Policy and by the methods specified below or by other methods determined by the Personal Data Protection Board, personal data owners will be able to fill and sign the Application Form and send it to **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** free of charge. Comprehensive regulation on this subject has been made in the customer clarification text of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** and the details of the Personal Data Application request.

Hand delivery of a copy with wet signature after filling the form on <http://www.intermakmakina.com> or delivered in writing by registered mail; submitting to the address of Davutpaşa Caddesi No: 73 / A 34010 Topkapı / ISTANBUL TURKEY or applying in person,

- Filling in the form available at www.saglammetal.com and signing with a "secure electronic signature" within the scope of Electronic Signature Law No.5070, sending the secure electronic signed form to intermakmatbaamakinalari@hs01.kep.tr mail address, application to intermakmatbaamakinalari@hs01.kep.tr mail address by using secure electronic signature, mobile signature or by using the electronic mail address previously notified to **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** and registered in the system of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** or through a software or application developed for the purpose of application

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, the person concerned must specify the following matters;

a) Signature if name, surname and application is written,

b) For Turkish citizens, Turkish ID number; for foreigners, nationality, passport number and, if any, identity number,

c) The place of residence or place of business for notification,

ç) Electronic mail address, telephone and fax number, if any,

d) Subject of Request,

- Otherwise, the application will not be considered as a valid application.

In the applications to be made without filling the application form, the issues listed here are completely **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**, 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 applicant.

19. RELATIONSHIP of İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.'s POLICY OF PERSONAL DATA PROTECTION AND PROCESSING WITH OTHER POLICIES

İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti. has established the principles set forth with this document, policies regarding other data assets within the body of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**, and sub-procedures for internal use regarding the protection and processing of personal data.

20. İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.'s PERSONAL DATA PROTECTION AND PROCESSING PROCESSES COORDINATION

A management structure has been established by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** to ensure compliance with the regulations of the Law of KVK and the enforcement of the Personal Data Protection and Processing Policy.

The Information Security Committee has been appointed within the body of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** to manage this Policy and other policies related to this Policy, in accordance with the decision of the Company's senior management.

The duties of this Committee regarding the protection of personal data are as follows:

- To prepare and put into effect the basic policies regarding the protection and processing of personal data and changes 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 internal assignment and coordination within this framework to the approval of the senior management,
- To determine the issues to be done in order to comply with the KVK Law and the relevant legislation and to submit them to the approval of the senior management, to observe its implementation and to ensure its coordination
- To increase awareness of the protection and processing of personal data within **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** and among the institutions with which **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** cooperates,
- To determine the risks that may occur in the personal data processing activities of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** and ensure that the necessary measures are taken, to submit improvement suggestions to senior management for approval,
- To organize trainings on the protection of personal data and the implementation and dissemination of policies, to ensure that personal data owners are informed about their personal data processing activities and their legal rights,
- To finalize the applications of personal data subjects at the top level,
- To follow the developments and regulations on the protection of personal data, to receive suggestions on what to do within **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** in accordance with these developments and regulations,
- To manage relations with the KVK Board and Institution,

- To perform other duties that may be given by the Company's senior management to protect personal data.

ANNEX-1 DEFINITIONS

Explicit Consent: Consent about a specific subject based on information and expressed in free will.

Anonymization: The modification of personal data in such a way that they lose their personal data feature and that this condition cannot be recovered. For instance, making personal data unassociated with a real person with techniques of masking, consolidation, data destruction, etc.

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

Employee Candidate: Real persons who have applied for a job to **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** in any way or who have opened their resume and related information.

Employees, Shareholders and Officials of Cooperated Institutions: Real persons, including employees, shareholders and officials of these institutions, in institutions (such as business partners, suppliers, but not limited to) with which **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** has any business relationship.

Business partner: Parties with which **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** has established business partnerships for purposes such as carrying out various projects in person or together and obtaining services while conducting its commercial activities.

Processing of Personal Data: All kinds of processes performed on personal data including obtaining, recording, storing, keeping, changing, re-arranging, disclosure, transmission, acquisition, making available, classification or prevention of use in whole or in part, automatically or in non-automatic ways, being part of any data recording system.

Personal Data Subject: Real person whose data are processed. For example; customer, staff, supplier employee

Personal Data: Any information related to the identified or identifiable real person. The processing of data relating to legal persons is hereby not within the scope of the Law. For instance; name-surname, TR identity number, e-mail, address, date of birth, credit card number, etc.

Special Quality Personal Data: Data on race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, dress code, membership of associations, foundations or trade unions, health, sexual life, criminal conviction and security measures, and biometric and genetic data.

Supplier: Parties providing services to **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** on a contract basis, in accordance with the orders and instructions of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** while conducting the commercial activities of **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.**

Third Person: Real persons whose personal data are not defined differently within the scope of the policy (eg family members, former employees).

Data Processor: A real and legal person who processes personal data on his/her behalf on the basis of the authority conferred by the data controller. For example, the cloud computing firm that keeps the data

Data Supervisor: 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, **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** is the data controller.

Deleting Data: It means that all relevant users in the company are encrypted in such a way that access to personal data is blocked and only the data protection officer has this password.

Data Destruction: It refers to the state of completely eliminating personal data in a way that cannot be reversed, physically or by technological methods.

Visitor: Real persons who have entered the physical sites owned by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** for various purposes or visited our websites.

ANNEX-2 DATES IMPORTANT FOR THE IMPLEMENTATION OF THE KVK LAW

April 7, 2016- As of April 7, 2016, **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** complies with the following obligations: (i) General rules and principles regarding the processing of personal data, (ii) Obligations regarding the enlightenment of personal data owners, (iii) Obligations regarding the provision of data security.

October 7, 2016- As of October 7, 2016, the following regulations will come into force and **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** will act in accordance with these regulations: (i) Provisions regarding the transfer of personal data to third parties and abroad, (ii) Regulations regarding the personal data owner, who owns the personal data, to exercise his/her right of application against **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** and to file a complaint with the KVK Board. (Learning whether personal data is being processed, requesting information, learning the persons to whom it is transferred, requesting correction)

April 7, 2017- As of April 7, 2017 (i) Consents obtained in accordance with the law before 7 April 2016 will be deemed in accordance with the KVK Law, unless the personal data owner makes a contrary statement. (ii) Regulations regarding the KVK Law will come into force.

April 7, 2018- 7 April 2018 Personal data processed before 7 April 2016 will be made compliant with the KVK Law, deleted or anonymized by **İntermak Matbaa Ve Tekstil Makinaları San. Ve Tic. Ltd. Şti.** until April 7, 2018.

This information is for websites with the domain name www.intermakmakina.com.

DATA CONTROLLER

İNTERMAK MATBAA VE TEKSTİL MAKİNALARI SAN. VE TİC. LTD. ŞTİ.

Mersis No:

Contact Link: <http://www.intermakmakina.com/Home/Profile>

Address: Merkezefendi Mah.Davutpaşa Cad No.73 Zeytinburnu / İSTANBUL

INFORMATION SECURITY POLICY

- To ensure the confidentiality and integrity of the information of our company and its customers,
- To provide the necessary infrastructure to guarantee the continuity of our company's services,
- To take physical and logical security measures in accordance with the value of the knowledge,
- Assigning access rights in accordance with the "need to know" principle to control access to information and prevent unauthorized access,
- To consider security needs while developing software,
- To protect information assets against malicious codes such as viruses and attacks that can be made outside the company in the cyber environment,
- To develop a response process against information security incidents,
- To provide information security trainings to employees and to increase information security awareness,
- To comply with laws and regulations,
- To ensure compliance of stakeholders with our Company's Information Security Policies,
- To comply with safe system engineering principles,

COOKIES USE PERMISSION

This website places cookies on your computer or mobile device you are using in order to improve the user experience and to ensure the effective operation of the site. By continuing to use the site (clicking, scrolling, turning off the cookie warning), you consent to the use of cookies. If you want, you can restrict or block the receipt of this information by making the necessary settings.

PERSONAL DATA PROTECTION POLICY

To process personal data in accordance with the law and good faith,

To ensure the accuracy and currency of the personal data processed,

To process personal data in a relevant, limited and measured manner,

To retain personal data for the period required for the purpose stipulated in the legislation or for the purpose for which they were processed,

To ensure that all our employees work with the consciousness to take the necessary measures and pay attention for the Protection of Personal Data,

To make the necessary investments and trainings regarding the protection of personal data,