

## **Proses Engineering Treatment Systems Construction Co.**

### **EXPLANATION TEXT ON THE PROTECTION AND PROCESSING OF PERSONAL DATA**

#### **1. Purpose:**

Proses Engineering Treatment Systems Construction Co. ("PROSES" or "Company") aims to process personal data of personal data owners (Annex-1 Explains Personal Data Owners Table) in accordance with the provisions of Personal Data Protection Law No. 6698 ("KVK Law") and other legislation.

Your personal data that you have/will notify to our Company and/or provided by our Company by any external means, as "Data Controller" by our Company,

- Within the framework of the purpose that requires the processing of your personal data and in connection with this purpose, limited and in moderation,
- By maintaining the accuracy and the most up-to-date version of the personal data you have notified or reported to our company,
- It will be recorded, stored, preserved, rearranged, shared with the institutions that are legally authorized to request this personal data and transferred to domestic or foreign third parties, transferred, classified and processed in other ways listed in the KVK Law, under the conditions stipulated by the KVK Law, and We inform you that it may be subject to other processes listed in the KVK Law.

With this "Lighting Text", it has been adopted to continue and develop the activities carried out by PROSES in accordance with the principles in the KVK Law.

#### **2. Terms of Processing Personal Data :**

The express consent of the personal data owner is only one of the legal grounds that enables the processing of personal data in accordance with the law, and in the presence of one of the following conditions, personal data is processed by our Company without seeking the explicit consent of the data owner.

Except for express consent, the basis of the personal data processing activity may be only one of the conditions stated below, or more than one condition may be the basis of the same personal data processing activity.

- Explicitly Provided in Laws: If it is expressly envisaged in the law, in other words, if there is a clear provision in the law regarding the processing of personal data, the personal data of the data subject may be processed by our Company within the framework stipulated in the legislation.
- Failure to Obtain the Explicit Consent of the Related Person due to Actual Impossibility: In case the personal data of the person who is unable to express his/her consent due to actual impossibility or whose consent cannot be validated is required to be processed in order to protect the life or bodily integrity of himself or another person, the personal data of the data owner may be processed.
- Being Directly Related to the Establishment or Performance of the Contract: Provided that it is directly related to the establishment or performance of a contract to which the data owner is a party, this condition may be deemed to have been fulfilled if the processing of personal data is necessary.
- The Company's Fulfillment of its Legal Obligations: In case data processing is mandatory for our company to fulfill its legal obligations, the personal data of the data owner may be processed.
- Publicizing the Personal Data of the Personal Data Owner In case the data owner has made his personal data public, the relevant personal data may be processed for the purpose of making it public on a limited basis.
- Obligatory Data Processing for the Establishment or Protection of a Right: If data processing is mandatory for the establishment, exercise or protection of a right, the personal data of the data owner may be processed.
- Obligatory Data Processing for the Legitimate Interest of Our Company Provided that the fundamental rights and freedoms of the personal data owner are not harmed, the personal data of the data owner may be processed if data processing is mandatory for the legitimate interests of our Company. Personel / Personel Adayı Kişisel Verilerinin Toplanması ve Usulü:

#### **3. Collection and Procedure of Personnel / Personnel Candidate Personal Data:**

Our company will process your personal data for the purposes specified in this Clarification Text. In case of any change in the purpose of processing your personal data, your consent will be obtained separately.

The personal data collected and used by our company are in particular:

**CONTENT OF PERSONAL DATA:**

<b>Identity Data</b>	Name-surname, T.C. Identity number, tax identification number, criminal record, residence record, signature/initial information, nationality information, mother's name, father's name, place of birth, date of birth, gender, driver's license, passport, identity card, blood group, health report documents such as information and copies of documents regarding disability/disabled status, if any.
<b>Communication Data</b>	Phone number, address, country, email address (including extension number and corporate email address).
<b>Employee Candidate Information</b>	It is the personal data of candidates who have applied to our company by any means or intern candidates, such as resumes, interview notes.
<b>Location Data</b>	It is personal data such as GPS location, travel data, which determines the location of our employees and the employees of the institutions we cooperate with when using our Company's vehicles.
<b>Salary Data</b>	Payroll paid/to be paid in accordance with the Employment Contract, bank account information on which the salary is paid, data included in the receipts processes when the payments are made.
<b>Other Data</b>	Data such as photographs, diplomas, graduation certificates, certificates, curriculum vitae, video and/or audio recordings taken at the workplace, job references, phone number, e-mail address, fingerprint.
<b>Personnel Transaction Data</b>	Data such as encryption transactions such as passwords and codes, which are required and recorded in the company's working system, correspondence and e-mails connected to the company e-mail accounts, even if they are allocated to the personnel.
<b>Financial Data</b>	Income tax deducted, series, sequence number, current account information, bank account information (account number, iban number), credit card number, data in the declaration processes.
<b>Other Data</b>	VAT declaration notification, form designs, invoice number, date, VAT declaration, Activity certificate, tax plate, trade registry gazette, invoice data, payment period, information in the vendor identification process
<b>Customer Transaction Data</b>	Information such as records for the use of products and services, instructions and requests of the customer for the use of products and services (type of payment document, date, serial-order number, etc.)
<b>Professional Experience Data</b>	Data on the diploma, date/number of the occupational medicine certificate
<b>Request/Complaint Management Information</b>	It means personal data regarding the receipt and evaluation of all kinds of requests and/or complaints directed to our company.
<b>Visual and Audio Data</b>	It is data of visual or auditory quality, such as photographs, camera/sound recordings.
<b>Physical Space Security Information</b>	It is the personal data such as camera records and visitor records regarding the records and documents taken during the entrance to the physical space, during the stay in the physical space.
<b>Audit and Inspection Information</b>	Personal data processed during internal or external audit activities within the scope of our company's legal obligations and compliance with company policies.

In order to fulfill its legal obligations, our company sends you the data you have submitted to our Company, both before the establishment of the contractual relationship, after the establishment of the contractual relationship and throughout it, through all kinds of information documents and documents obtained in the physical or electronic environment, and in physical or electronic environments for the reasons stipulated in the laws. and through the cameras we place on Company buildings.

**4. Purposes of Processing Personal Data and Legal Reasons**

Your Personal Data may be processed by our Company for the purposes stated below, but not limited to these.

Duties, Authorities, Responsibilities and Trainings of Personnel, Labor Law, Commercial Code, Code of

Obligations, Occupational Health and Safety Law, Tax Procedure Law, Income Tax Law, Corporate Tax Law, Stamp Tax Law, Value Added Tax Law and the legislations listed. In particular, in order to fulfill legal obligations and requirements;

**In terms of our subcontractors and suppliers:**

- Making the stamp tax declaration notification, Notifying the purchase and sale of goods and services,
- Making notifications regarding the purchase and sale of goods and services,
- Making the concise declaration notification,
- Value added tax return, provisional tax return, corporate tax return
- making notifications,

**For the purpose of establishment and performance of the contract, in particular;**

- Recruitment/supply of personnel,
- Employee employment/periodic examination,
- Conducting employee inspection,
- Preparation, approval and recording of progress payments,
- Minutes and recording of the work done and delivered,
- Processing invoices from vendors,
- Opening a record in the system for the seller,
- Follow-up of purchase orders,

In accordance with the legitimate interests of the data controller and for the implementation of our Company's policies, in particular;

**In terms of our employee and employee candidates:**

- Submitting SSI declaration,
- Making the Stamp tax declaration notification of the Employment Contract,
- Supervision of the duties and authority given to the personnel in the company,
- Ensuring the operation of the company,

**For the purpose of establishment and performance of the contract, in particular;**

- Evaluation of personnel background and work experience
- Employee employment/periodic examination,
- Submitting SSI monthly statements,
- Payment of salary and other labor rights, if any.
- Keeping the personnel files physically and electronically, provided that they remain within the employer's retention and submission period in accordance with the Occupational Health and Safety, Social Security Law and Labor Law,
- Recording all of the above written matters, Veri sorumlusunun meşru menfaati gereği ve

**In particular, in order to implement our company's policies;**

Your personal data, until the disappearance of the purpose specified in the relevant legislation or processing. It will be retained for the reasonable period of time that will elapse and, possibly, for the statutory statute of limitations.

**5. Transfer of Personal Data to Third Parties**

In order to fulfill legal obligations and employment contract requirements, including but not limited to Income Tax Law, Corporate Tax Law, Tax Procedure Law, Labor Law and Social Security Law, Occupational Safety and Health Law and these legislations; It can be transferred to the Revenue Administration, the General Directorate of Security, the relevant employees of our Company, the related companies and the group company.

**Transfer of Personal Data to Domestic Third Parties;**

In particular, in order to fulfill legal obligations pursuant to Income Tax Law, Corporate Tax Law, Tax Procedure Law, Labor Law, Social Security Law, Occupational Safety and Health Law and applicable legislation, laws, regulations and communiqués;

- Evaluation of personnel background and work experience
- Employee employment/periodic examination,
- Submitting SSI monthly statements,
- Payment of salary and other labor rights, if any.
- Keeping the personnel files physically and electronically, provided that they remain within the employer's retention and submission period in accordance with the Occupational Health and Safety, Social Security Law and Labor Law,
- Recording all of the above written matters,
- Making the stamp tax return declaration,
- Making notifications regarding the purchase and sale of goods and services,
- Concise declaration, value added tax return, provisional tax return, corporate filing tax returns,
- It can be transferred to the relevant OHS specialist or legal entity on Social Security Institution and Occupational Health and Safety.

## **6. Ensuring the Security and Confidentiality of Personal Data**

In accordance with Article 12 of the KVK Law, our company takes all necessary technical and administrative measures to ensure the appropriate level of security in order to prevent the unlawful processing of the personal data it processes and the unlawful access to personal data, and to ensure the protection of personal data.

### **6.1 Technical Measures Taken to Ensure Legal Processing of Personal Data and to Prevent Unlawful Access to Personal Data**

- Taking technical measures to the extent that technology allows
- Recruitment of experts in technical matters
- Auditing the implementation of the measures taken at regular intervals
- Creation of necessary software and infrastructure to ensure security
- Limitation of access to data being processed within the company
- Using the backup program in accordance with the law to ensure the safe storage of personal data
- Use of software containing virus protection systems

The company has taken all kinds of technical and technological security measures to protect your personal data. has protected your personal data against possible risks.

### **6.2 Administrative Measures to Ensure Legal Processing of Personal Data and to Prevent Unlawful Access to Personal Data**

- Training and raising awareness of company employees regarding the KVK Law,
- In cases where personal data transfer is in question, ensuring that a record is added to the contracts concluded with the persons to whom the personal data is transferred, stating that the party to which the personal data is transferred will fulfill the data security,
- Determining what needs to be fulfilled in order to comply with the KVK Law and preparing internal policies for their implementation,

### **6.3 Measures to be Taken in Case of Unlawful Disclosure of Personal Data**

- In case the processed personal data is obtained by others illegally, our Company will notify the relevant data owner and the Management as soon as possible.

## **7. Deletion, Destruction and Anonymization of Personal Data**

Pursuant to Article 7 of the KVK Law, although the personal data has been processed in accordance with the relevant legislation, the personal data is deleted, destroyed or anonymized by our Company, ex officio or upon the request of the personal data owner, in case the reasons for processing are no longer valid.

The procedures and principles regarding this matter will be fulfilled in accordance with the KVK Law and

the secondary legislation to be formed on the basis of this Law.

### **7.1 Techniques for Deletion and Destruction of Personal Data**

- Example: physical destruction, soft soft wipe, expert secure wipe, etc.

### **7.2 Techniques for Anonymization of Personal Data**

- It means making personal data in a way that cannot be associated with an identified or identifiable natural person under any circumstances, even by matching with other data.

## **8. Rights of Personnel/ Personnel Candidate**

Pursuant to Article 11 of the KVK Law, you can apply to our Company about your personal data as follows:

You can make requests regarding:

- Learning whether personal data is processed or not,
- If personal data has been processed, requesting information about it,
- To learn the purpose of processing personal data and whether they are used in accordance with the purpose,
- Learning the third parties whose personal data are transferred in the country or abroad,
- Requesting correction of personal data if it is incomplete or incorrectly processed, and Requesting notification of the transaction made within the scope of the transaction to the third parties to whom the personal data has been transferred,
- Requesting their deletion, destruction or anonymization in the event that the reasons requiring the processing of personal data disappear, and requesting the notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,
- By analyzing the processed personal data exclusively through automated systems.to object to the emergence of a result against the data owner,
- In case of damage due to unlawful processing of personal data, don't demand removal.

## **9. Rights of the Subcontractor / Supplier**

Pursuant to Article 11 of the KVK Law, you can apply to our Company about your personal data as follows: You can make requests regarding:

- Learning whether personal data is processed or not,
- If personal data has been processed, requesting information about it,
- To learn the purpose of processing personal data and whether they are used in accordance with the purpose,
- Learning the third parties whose personal data are transferred in the country or abroad,
- Requesting correction of personal data if it is incomplete or incorrectly processed, and requesting the notification of the transaction made in this context to the third parties to whom the personal data has been transferred,
- Requesting their deletion, destruction or anonymization in the event that the reasons requiring the processing of personal data disappear, and requesting the notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,
- By analyzing the processed personal data exclusively through automated systems. to object to the emergence of a result against the data owner,
- Requesting the compensation of the damage in case of loss due to unlawful processing of personal data.

### **DATA SPEAKER**

**PROSES** Engineering Treatment System Construction Ind.Co. We hereby declare that we process your personal data as a data controller, within the scope of the Law on Protection of Personal Data No. 6698 (hereinafter referred to as "KVKK") and other relevant legislation.

**DATA SPEAKER** : **PROSES Engineering Treatment System Construction Ind.Co.**  
**ADRESS** : **Esentepe Mah. Kelebek Sokak No:2 K.15 D.128 34870 Kartal / İSTANBUL**  
**COMMUNICATION** : [proses@prosesmuhendislik.com](mailto:proses@prosesmuhendislik.com)

Our company will fulfill your requests arising from the KVK Law through the "Personal Data Owner Application Form". To "Personal Data Owner Application Form" [http://prosesmuhendislik.com/media/files/dosyalar/proses-calisan-adayi-kisisel-verilerin-islenmesine-iliskin-aydinlatma-metni\\_EN.pdf](http://prosesmuhendislik.com/media/files/dosyalar/proses-calisan-adayi-kisisel-verilerin-islenmesine-iliskin-aydinlatma-metni_EN.pdf) You can access it from the link. Our company will conclude your application requests free of charge within 30 (thirty) days at the latest, according to the nature of the request, in accordance with Article 13 of the KVK Law. In case the request is rejected, the reason(s) for the refusal will be notified to you in writing or electronically.

This Clarification Text may be revised by our Company when deemed necessary. In case of revision, our clarification text will be published at [www.prosesmuhendislik.com](http://www.prosesmuhendislik.com) by specifying the revision date.