



**SOM FASTENERS
PERSONAL DATA
PROTECTION AND
PROCESSING POLICY**

Preparation date: 07.11.2019

Revision Date: 03.03.2021

SOM FASTENERS PERSONAL DATA PROTECTION AND PROCESSING POLICY

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Law on PDP COMMITTEE	GENERAL MANAGER



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1. INTRODUCTION

1.1. Purpose and Scope of the Policy

1. Law No. 6698 on Protection of Personal Data (**the "Law"**) entered into force on April 7, 2016; and This SOM Fasteners Personal Data Processing and Protection Policy ("**Policy**") aims SOM Fasteners (**the "Company"**) to comply with the Law and to determine the principles to be followed in fulfilling the obligations regarding the protection and processing of personal data by the Company.

The policy determines the processing conditions of personal data and sets out the main principles adopted by the Company in the processing of personal data. In this context, the Policy covers all personal data processing activities carried out by the Company within the scope of the Law, the subjects of all personal data processed by the Company and all personal data processed.

Issues related to the processing of personal data of **employees** of the company are not covered by this Policy and are regulated separately in SOM Fasteners Employee Personal Data Processing and Protection Policy.

Definitions of terms used in the policy are available in ANNEX-1.

1.2. Enforcement and Amendment

The policy has been made public by the Company on its website. In case of conflict with the legislation in force, especially the Law, and the regulations included in this Policy, the provisions of the legislation shall be applicable.

The Company reserves the right to make amendments in the Policy in line with the legal regulations.

2. DATA SUBJECTS, DATA PROCESSING PURPOSES AND DATA CATEGORIES FOR THE PERSONAL DATA PROCESSING ACTIVITIES OF OUR COMPANY

2.1. Data Subjects

The data subjects within the scope of the policy are all-natural persons except Company employees whose personal data are processed by the Company. In this context, generally the categories of data subjects are as follows:

DATA SUBJECT CATEGORIES		EXPLANATION
1.	Employee Candidate	Real persons who apply for a job to the company by sending their Resumes or other methods
2.	Families of Employees	Family members of employees of the company
3.	Apprentice	People working as apprentices in the company
4.	Everyone	Every natural person concerned
5.	Shareholder	Shareholder / partner real persons of the company
6.	Official of business partner	Legal person business partner's officials or the real person business partner himself

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7.	Employee of business partner	Legal person business partner's employee
8.	Customer Representative	Officials of private legal entities in the position of customers
9.	Customer's Employee	Employees of private legal entities in the position of customers
10.	Potential Customer	The company, its officers and employees who are prospective customers of the company
11.	Intern	Employees who are legally work as intern in the company
12.	Subcontractor's Employee	Employees of companies that the company has established services
13.	Official of Subcontractor	Officials of companies that the company has established services
14.	Supplier's Employee	Employees of companies from which the company purchases products or services
15.	Supplier's Official	Officials of companies from which the company purchases products or services
16.	Third Person	OHS Specialist, Auditor, Consultant, Tenant, Property Owner
17.	Visitor	Third parties entering the company building

The categories of data subjects are specified for general information sharing. The fact that the data subject does not fall within the scope of any of these categories does not eliminate the data subject qualification as specified in the Law.

2.2. Purposes of Personal Data Processing

Your personal data and sensitive personal data can be processed by the Company for the following purposes in accordance with the personal data processing conditions stipulated in the Law and the relevant legislation:

- Execution of Information Security Processes
- Execution of Employee Candidate / Intern / Student Selection and Placement Processes
- Execution of Employee Candidates' Application Processes
- Execution of Benefits and Interests Processes for Employees
- Conducting Audit / Ethical Activities
- Conducting Training Activities
- Execution of Access Authorities
- Conducting Activities in Compliance with Legislation
- Execution of Finance and Accounting Affairs

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- Execution of Loyalty Processes of Company / Products / Services
- Ensuring Physical Space Security
- Execution of Assignment Processes
- Follow-up and Execution of Legal Affairs
- Conducting Internal Audit / Investigation / Intelligence Activities
- Planning of Human Resources Processes
- Execution / Supervision of Business Activities
- Conducting Occupational Health / Safety Activities
- Ensuring Business Continuity and Conducting Activities
- Execution of Goods / Service After Sales Support Services
- Execution of Goods / Service Sales Processes
- Execution of Goods / Service Production and Operation Processes
- Execution of Customer Relations Processes
- Conducting Activities Addressing Customer Satisfaction
- Execution of Retention and Archive Activities
- Execution of Social Responsibility and Civil Society Activities
- Execution of Contracting Processes
- Execution of sponsorship activities
- Ensuring Security of Movable Goods And Resources
- Execution of Supply Chain Management Processes
- Execution of Wage Policy
- Execution of Marketing Processes of Products / Services
- Ensuring the Security of Data Controller Operations
- Execution of Investment Processes
- Informing Authorized Persons, Institutions and Organizations
- Creating and Tracking Visitor Records

2.3. Personal Data Categories

Your personal data is be processed in accordance with the personal data processing conditions stipulated in the Law and the relevant legislation:

PERSONAL DATA CATEGORIZATION	EXPLANATION
Identity Information	Identity of the person in documents such as driver's license, identity card, residence, passport, lawyer identity, marriage certificate Name

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	and surname, Mother and father's name, Mother's maiden name, Date of birth, Place of birth, Marital status, Identity card serial number, Turkish identity card, registration plate number
Contact information	Information about contact details of the data subject such as phone number, address, e-mail
Personal Information	Personal data (all kinds of information and documents that must be entered in the personal file as required by law and workplace policies), which are the basis for the formation of employee personal rights, Payroll information, Discipline investigation, Employment document records, Property declaration information, resume information, body size, Performance evaluation reports, etc.
Customer Transaction Data	Information obtained and produced about the person concerned as a result of our commercial activities and operations carried out by our business units within this framework
Physical Place Security Data	Camera recordings taken at the entrance to the physical space, during the stay in the physical space
Transaction Security Data	Your personal data processed to ensure our technical, administrative, legal and commercial security while conducting our commercial activities.
Financial Data	Processed personal data, bank account information regarding information, documents and records showing all kinds of financial results created according to the type of legal relationship our company has established with the personal data owner.
Professional Experience Data	Data on professional experience background
Health Information	All kinds of health information pertaining to an identified or identifiable real person.
Audio-Visual records	All kinds of visual and audio records associated with the personal data subject of our employees (For example, photography, camera recording, sound recording, etc.)
Criminal Convictions and Security Measures	Criminal record information of our employees
Sensitive Personal Data	Data on Individuals' race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, costume and dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data is deemed as sensitive data. Health information and criminal record regarding employees are considered within this scope.
Information on Family Members and Relatives	Information about family members and relatives of the personal data subject processed to protect the legal interests of the company and the data subject
Incident Information	Information and documents regarding the accidents experienced by the employees

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Legal Transaction Data	Payroll information, Disciplinary investigation, Recruitment document records, Property declaration information, Resume information, Performance evaluation reports, Insurance Information, Recruitment and exit control information, body measurements
Risk management	Information processed to manage commercial, technical and administrative risks.

3. PRINCIPLES AND TERMS RELATED TO THE PROCESSING OF PERSONAL DATA

3.1. Principles Regarding Processing of Personal Data

Your personal data will be processed in accordance with the personal data processing principles stipulated in the article 4 of the Law and the relevant legislation. These principles must be followed in terms of each personal data processing activity:

- **Processing of personal data in accordance with the law and good faith;** The company acts in accordance with the laws, secondary regulations, and general principles of law in the processing of your personal data; attaches importance to processing personal data limited to the purpose of processing and considering the reasonable expectations of data subjects.
- **Personal data to be accurate and up to date;** It is paid attention to whether your personal data processed by the company is up-to-date and that the relevant controls are made. In this context, data subjects are granted right to request the correction or deletion of their incorrect and outdated data.
- **Processing of personal data for specific, explicit, and legitimate purposes;** The company determines the data processing purposes before each personal data processing activity and takes care that these purposes are not illegal.
- **Being connected, limited, and measured with the purpose for which personal data are processed;** The data processing activity of the company is limited to the personal data required to realize the purpose of collecting and the necessary steps are taken to prevent the processing of personal data that is not related to this purpose.
- **Retaining the personal data for the period required by legislation or processing purposes;** Personal data are deleted, destroyed, or anonymized after the purpose of personal data processing by the company is eliminated or the period stipulated in the legislation expires.

3.2. Conditions Regarding Processing of Personal Data

Your personal data is processed by the Company in the presence of at least one of the personal data processing conditions specified in Article 5 of the Law. Explanations regarding these conditions are as follows:

- **The explicit consent of the personal data owner,** in cases where other data processing conditions do not exist, in accordance with the general principles under the heading of 3.1., the personal data of the data subject can be processed by the Company with the free will of the data

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subject, with sufficient knowledge of the personal data processing activity, without any hesitation and only if the data subject gives his/her consent limited to that transaction.

- ***In case the personal data processing activity is explicitly stipulated*** by the laws, the personal data may be processed by the Company without the explicit consent of the data subject. In this case, the Company will process personal data within the framework of the relevant legal regulation.
- ***In case the explicit consent of the data owner cannot be obtained due to the actual impossibility and personal data processing is mandatory***, the personal data belonging to the data subject who is unable to disclose his/her consent or whose consent cannot be validated, and the personal data processing is mandatory in order to protect the life or body integrity of the data owner or a third person, data will be processed by the company.
- ***In the event that the personal data processing activity is directly related to the establishment or execution of a contract***, personal data processing activity will be carried out if it is necessary to process the personal data of the parties of the contract established or already signed between the data subject and the Company.
- ***In the event that it is necessary to carry out personal data processing activity in*** order to fulfill the legal obligation of the data controller, the Company processes personal data in order to fulfill its legal obligations under the current legislation.
- ***The fact that the data subject has made his/her personal data public***, the personal data that has been made public by the data subject in any way, and the personal data that has been made public as a result of publicization, may be processed by the Company, even without the explicit consent of the data subject, with the aim limited to making it public.
- ***In case personal data processing is mandatory for the establishment, use or protection of a right***, the company will be able to process the personal data of the data subject without the explicit consent of the data subject within the scope of necessity.
- ***Provided that it does not harm the fundamental rights and freedoms of the data subject, if data processing is mandatory for the legitimate interests of the data controller***, personal data may be processed by the Company, provided that the balance of interests of the Company and the data subject is observed. In this context, in the processing of data based on legitimate interests, the Company first determines the legitimate interest to be obtained as a result of the processing activity. It evaluates the possible effect of the processing of personal data on the rights and freedoms of the data subject and if it is of the opinion that the balance is not disturbed, it carries out the processing activity.

3.3. Conditions Regarding Processing of Sensitive Personal Data

In article 6 of the Law, sensitive personal data are specified in a limited number. These are Individuals' race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, costume and dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data.

The Company is entitled to process sensitive personal data by taking additional measures determined by the Personal Data Protection Board in the following situations:

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- **The processing of sensitive personal data other than health and sexual life can be processed if the data subject gives express consent or if it is explicitly stipulated in the law.**
- Personal data related to health and sexual life are processed by persons or authorized institutions and organizations under the obligation of confidentiality for the purpose of protecting public health, conducting preventive medicine, medical diagnosis, treatment and care services, planning and managing health services and financing without taking explicit consent of data subject..

4. TRANSFER OF PERSONAL DATA

The company may transfer personal data inland or abroad in accordance with the additional regulations listed in Articles 8 and 9 of the Law and determined by the Personal Data Protection Board, in case there are conditions to transfer personal data.

- **Transfer of personal data to third parties domestically**, in the presence of at least one of the data processing conditions specified in Article 5 and 6 of the Law and explained under Title 3 of this Policy, and provided that the basic principles of data processing are complied with, your personal data will be transferred by the company.
- **Transfer of personal data to third parties abroad**, in the presence of at least one of the data processing conditions specified in Article 5 and 6 of the Law and explained under Title 3 of this Policy, and in cases where express consent of the person is not existing, and provided that the basic principles of data processing are complied with, your personal data will be can be transferred by the company.

In the event that the country to which the transfer will be made is not among the safe countries to be announced by the Personal Data Protection Board, the Personal Data is Personal data may be transferred abroad to third parties by the Company in the presence of at least one of the data processing conditions (see Policy 3. Title), on condition the data controller in the relevant country undertaking sufficient protection in writing.

Within the general principles of the Law and the data processing conditions specified in Articles 8 and 9, the Company can transfer data to the parties categorized in the table below:

SHARED PARTY CATEGORIZATION	SCOPE
Authorized public institutions and organizations,	Public institutions and organizations authorized to receive information and documents from our Company.
Real Persons or Private Law Legal Persons	Real Persons or Private Law Legal Persons Publicly known shareholders Affiliates and subsidiaries Suppliers Subcontractors Bank

The company carries out data transfer for the following purposes and for legal reasons;

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Purposes

- Conducting Activities in Compliance with Legislation
- Execution of Finance and Accounting Affairs
- Planning of Human Resources Processes
- Execution / Supervision of Business Activities
- Ensuring Business Continuity and Conducting Activities
- Execution of Contracting Processes
- Informing Authorized Persons, Institutions and Organizations

Legal reasons

- the explicit consent of the personal data
- Establishment and execution of the contract
- It is mandatory to carry out personal data processing activity in order to fulfill the legal obligation of the data controller.
- Processing of personal data is compulsory to establish or protect a right
- Provided that the fundamental rights and freedoms of the personal data subject are not harmed, processing of personal data is compulsory for the legitimate interests of the data controller

5. CLARIFICATION OF DATA SUBJECTS AND RIGHTS OF DATA SUBJECTS

According to Article 10 of the Law, data subjects should be informed about the processing of personal data before the processing of personal data or at the time of processing personal data at the latest. In accordance with the relevant article, the necessary internal structure has been established in order to ensure that data subjects are enlightened in every situation where personal data processing is carried out by the Company as the data controller. In this context;

- For the purpose of processing your personal data, please see section 2.2. of this policy
- For the purpose of processing your personal data, please see the section 4. of this policy.
- In order to examine the terms of the processing of your personal data that can be collected in physical or electronic environments through different channels, please see sections 3.2 and 3.3 of this Policy.
- We would like to state that you have the following rights in accordance with Article 11 of the Law as a data subject.
 - To learn whether your personal data has been processed,
 - To demand information in case your personal data has been processed,
 - To learn the purpose of processing your personal data and whether they are used appropriately,
 - To know the third parties in which your personal data is transferred in land or abroad,
 - To request that the procedures for correction of your personal data, and to request notification of the transaction made within this scope to third parties to whom personal data has been transferred,

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- To request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear, despite the fact that it has been processed in accordance with the provisions of the law and other relevant laws,
- To make objection in the event of an occurrence of an unfavorable result in case your personal data is processed exclusively by means of automated systems,
- To claim for your loss in case you have damages because your personal data has been processed in illegal manner.

You can submit your applications regarding your rights listed above to our Company by filling out the Data Subject Application Form, which you can access <https://www.somas.com.tr> address. Depending on the nature of your request, your applications will be concluded free of charge as soon as possible and within thirty days at the latest; However, if the transaction requires an additional cost, you may be charged according to the tariff determined by the Personal Data Protection Board.

During the evaluation of the applications, the company first determines whether the applicant is the real beneficiary or not. However, when the company deems necessary, it may request detailed and additional information in order to better understand the request.

Responses to data subject applications are notified to data owners in writing or electronically by the company. In case the application is rejected, the reasons for rejection will be explained to the data subject with justifications of the rejection.

In case personal data are not obtained directly from the data subject; the Company carries out activities on clarification of data subjects (1) within a reasonable period from the acquisition of personal data, (2) during the initial communication if the personal data will be used for communication with the data subject, (3) if the personal data will be transferred, at the latest for the first time.

6. DELETING, DESTRUCTION AND ANONYMIZING OF PERSONAL DATA

Despite the fact that it has been processed in accordance with the law in accordance with Article 7 of the Law, in the event that the reasons for its processing disappear, the Company deletes, destroys or anonymizes the personal data ex officio or upon the request of the data subject, in accordance with the guidelines published by the Authority.

7. LIMITATIONS ON THE SCOPE AND APPLICATION OF THE LAW

The following situations are out of the scope of the Law:

- Processing of personal data by real persons within the scope of activities related to him or his family members living in the same residence, provided that they are not provided to third parties and obligations regarding data security are complied with.
- Processing personal data for purposes such as research, planning, and statistics by making them anonymous with official statistics
- Processing of personal data for artistic, historical, literary, or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, public order, economic security, privacy of private life or personal rights or constitute a crime.

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- Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order or economic security.
- Processing of personal data by judicial authorities or execution authorities in relation to investigation, prosecution, trial, or execution proceedings.

The Company is not required to inform the data subjects in the following cases, and the data subjects will not be able to use their rights specified in the Law, except for their rights to compensate their damages:

- Processing of personal data is necessary for the prevention of crime or for a criminal investigation.
- Processing of personal data made public by the person concerned.
- The processing of personal data is necessary for the execution of supervision or regulation duties and disciplinary investigation or prosecution by the authorized and authorized public institutions and organizations and professional organizations that have the status of public institutions, based on the authority granted by the law.
- Processing of personal data is necessary for the protection of the economic and financial interests of the State regarding budget, tax, and financial issues.

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ANNEX-1 DEFINITIONS

DEFINITION	
Personal Data	All kinds of information belonging to an identified or identifiable natural person.
Sensitive Personal Data	It refers to data on Individuals' race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, costume and dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data.
Personal Health Data	All kinds of health information pertaining to an identified or identifiable real person.
Data subject / Relevant Person	The real person whose personal data is processed.
Employee	Real persons working under definite / indefinite-term, full-time / part-time employment contracts and other contracts who are company employees or interns
Employee Candidate	Natural persons who are not employees of the Company but who are in the status of Company employee candidate through various methods
Processing of Personal Data	Any action taken on the data, such as blocking, obtaining, recording, storing, preserving, changing, reorganizing, disclosing, transferring, taking over, making available, classifying or using personal data through fully or partially automatic means or non-automatic means provided that they are part of any data recording system.
Explicit Consent	A consent based on information on a particular subject, which is stated with free-willed and in informed manner.
Data Controller	A natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.
Data processor	The real or legal person who processes personal data on behalf of the data controller based on the authority given by him.
Personal Data Processing Inventory	The inventory where personal data processing activities carried out by data controllers depending on the business processes; The inventory that they have created by associating with the data category, the recipient group and the data subject group of personal data processing purposes and the legal reason, explaining the maximum retention period required for the purposes for which the personal data is processed, the personal data foreseen to be transferred to foreign countries and the measures taken regarding data security.
Personal Health Data	All kinds of health information pertaining to an identified or identifiable real person.

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Law on Protection of Personal Data	The Law on the Protection of Personal Data dated March 24, 2016 and numbered 6698
Constitution	Constitution of Republic of Turkey numbered 2709
PPD Law Board	Personal Data Protection Board.
PPD Law Board	Personal Data Protection Institution.
Policy	Personal Data Protection and Processing Policy of SOM Fasteners
Company / Data Controller	Som Civata Somun San. Tic. A.S. (SOM Fasteners)
Business partners	Persons with whom the company has established partnerships within the scope of contractual relationships within the framework of its commercial activities.

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