

**SUBJECT : PERSONAL DATA PROCESS AND PROTECTION POLICY****DOCUMENT NO. : KVK.02.02****PAGE NO. : 1 / 13****REVISION NO. : 0****EFFECTIVE DATE : 03.05.2018****REVISION FOLLOW-UP**

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## POLICY DOCUMENT

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**CONTENT**

- 1. Purpose and Scope**
- 2. Definitions**
- 3. Roles and Responsibilities**
- 4. Principles on Process of Personal Data**
- 5. Conditions of Personal Data Process**
- 6. Protection of Personal Data**
- 7. Protection of Personal Data**
- 8. Personal Data and Data Categories**
- 9. Disposal of Personal Data**
- 10. Rights of Personal Data Owners and Application to Data Supervisor**
- 11. Circumstances in Which Personal Data Owners Cannot Exercise Their Rights**
- 12. Review**

## 1. PURPOSE AND SCOPE

From past to present, Kordsa Teknik Tekstil Anonim Şirketi ("Kordsa") adopted to show utmost importance to the order of law. Accordingly, all kinds of operations are being carried out in order to conform with Protection of Personal Data Law numbered 6698 and the sub legal regulations which are intended for process and protection of personal data.

Kordsa Personal Data Process and Protection Policy ("PVP Policy") aims to determine the basic principles to be applied for carefully processing and protecting personal data in all departments, operations and processes as remaining limited with legitimate purposes in accordance with the law. Sustainability of data safety principle in our company is aimed by adopting PVP Policy.

**In this policy, basic principles are expressed to conform the operations run by Kordsa to the current regulations in the law.**

**PVP Policy is applied for personal data of natural persons such as Kordsa employee candidates, old employees, consultants, shareholders, employees of business associates and visitors and which is not processed by Kordsa automatically by being a part of a Data Registry request completely or partially.**

Kordsa sets up the necessary system to create awareness about protection of personal data and procures the necessary order to provide internal transactions to conform with regulations of personal data protection and process.

PVP policy is published on website of Kordsa (<http://www.kordsa.com>) and it is open for access of personal data owners. In parallel with the changes and innovations in the related regulation, amendments to be occurred Kordsa PVP Policy will be open to access of personal data owners in a way they can access easily. In case there is a contradiction between the law and Kordsa PVP Policy, the provisions of the law in force will be deemed binding.

## 2. DEFINITIONS

**"Express Consent"** Written consent which is declared with a free will and related to a certain subject and referring to a briefing.

**"Disposal"** Deletion, disposal of personal data or anonymizing personal data.

**"Sabancı Holding"** Hacı Ömer Sabancı Holding A.Ş.,

**"Personal Data"** All kinds of information on identified person or identifiable natural person (Expression of "Personal Data" in this PVP Policy also comprise "Special Quality Personal Data" in the degree where it is applicable.

**"Data Owner/Related Person"** Natural person whose personal data is being processed.

**"Process of Personal Data"** All kinds of transaction carried out over data such as collection, record, storage, amendment, rearrangement, disclosing, transfer, taking over, being acquirable, classifying or detention of use of personal data non-automatically by being a part of an automatic data registry system completely or partially.

**“Kordsa Business Partners”** As carrying out the commercial operations, persons who sells goods or services to Kordsa and without being limited with these, associating partnership with various purposes.

**“Kordsa PVP Committee”** Committee which is formed by participation of Global Law, Global Human Resources and Global Information Technologies Functions with the purpose of providing conformity with Law and sustainability and protection of conformity.

**“Application Form of Data Owner”** The application form which can be used by Personal Data Owner while making applications related to rights stated in article 11 of the Law.

**“Data Processor”** Natural or legal person who processes the personal data in the name of Data Supervisor upon the authority given by Data Supervisor,

**“Data Supervisor”** Kordsa Teknik Tekstil Anonim Şirketi who is responsible with the foundation and management of data registration system which determines the purposes and tools of personal data process,

**“Special Quality Personal Data”** Data related to race, origin, political view, philosophical thought, religion, sect or other beliefs, dress, society, foundation or union membership, health, sexual life, conviction and safety precautions, and biometric and genetic data.

### **3. ROLES AND RESPONSIBILITIES**

CEO is responsible with the application of this PVP Policy and other related policy and/or procedures and Kordsa PVP Committee will be the primary advisory source and guide in matters such as planning necessary training with the purpose of providing conformity, ensuring communication between functions and resolving demands that might come from Data Owners.

Kordsa all function and employees, employee candidates, former employees, consultants, shareholders, employees of business associates, visitors and other natural persons are responsible with application, generalizing and sustainability of the determined principles of PVP Policy. With this purpose, all our employees, employee candidates, old employees, consultants, shareholders, employees of business associates, visitors and other natural persons are responsible with collaborating with PVP committee and reporting any violation to Kordsa PVP Committee without any delay.

### **4. PRINCIPLES ON PROCESS OF PERSONAL DATA**

Kordsa always follow the principles in the following and ensures that employees also follow these principles:

#### **4.1 Conforming rules of law and righteousness**

Kordsa personal data always adopt processing data in accordance with rules of law and principles of righteousness as primary purpose.

#### **4.2 Providing right and updated data**

Kordsa tries to provide that collected personal data is right and updated as much as the technical possibility and takes necessary precautions to correct faulty data or to confirm the accuracy of the data when necessary.

#### **4.3 Processing personal data in accordance with purpose, in a limited and measured way**

Kordsa processes personal data for clear, public and certain purposes and in a limited and measured way in relation with these purposes. Personal data is not processed with the thought of it will also be required in the future periods. Kordsa shows regard to basic rights and benefits of the data owners.

#### **4.4 Storing the personal data for the required duration for the process purpose or the duration stated in the related regulation**

**Kordsa preserves the personal data for the duration stated in the related regulation or for the required reasonable duration for the process purpose and conforms to time limitations. Kordsa disposes the personal data following the expiration of the duration stated in the regulation and the reasons to process of personal data disappear.**

### **5. CONDITIONS OF PERSONAL DATA PROCESS**

**Personal data is processed in accordance with the principles and basis stated in the following.**

#### **5.1 Express Consent**

**Personal Data is processed with the express consent of Data Owner following the sufficient briefing given to Data Owner in the frame of fulfilling disclosure requirement.**

Kordsa briefs the Data Owner about the matters stated in the following:

- The purpose of processing the Personal Data,
- Who and with what purpose the processed personal data can be transferred to,
- The method of personal data collection and legal cause,
- The rights of the related person that arise from PVP Law,
- Commercial Title of Kordsa as the Data Supervisor.

## **5.2 Process of Personal Data without requiring Express Consent**

**In case of one of the following conditions, it is possible to process Personal Data without requiring Express Consent of Data Owner:**

- **Predicted clearly in Laws.**
- **When it is mandatory to process personal data to preserve the life of the person or someone else or the body integrity of a person who is unable to express his/her consent with the reason of legal disability or a person whose consent is not valid in the law.**
- **On condition that it is related directly with exercise or drawn of an agreement, when it is required to process the Personal Data of parties of the agreement.**
- **When it is mandatory to process personal data to fulfill the legal obligation of Kordsa as Data Supervisor.**
- **When the personal data is made public by the related person himself/herself.**
- **When it is mandatory to process data to establish, exercise or protect a right.**
- **When it is mandatory to process data for the legitimate interests of Kordsa as data supervisor on condition that fundamental right and freedoms of the related person is not damaged.**

## **5.3 Conditions of Special Quality Personal Data Process**

Special Quality Personal Data can be processed with the Express Consent of the Data Owner. If the Express Consent of the Data Owner is not available;

- Special Quality Personal Data of the Data Owner except the data about sexual life and health, can be processed without requiring Express Consent in the event where it is predicted in the laws clearly.
- And the Special Quality Personal Data related to sexual life and health data of the data owner can be processed without requiring Express Consent with the purpose of preserving public health, carrying out preventive medicine, medical diagnosis, treatment and cure services, planning and management of health services and finance.

As Special Quality Data are being processed, adequate precautions determined by Personal Data Protection Committee are taken.

## **6. PROTECTION OF PERSONAL DATA**

Necessary precautions are taken in Kordsa with the purpose of protecting personal and special quality personal data. Close attention is paid to prevent usage and sharing of data with other reasons and to prevent access of unauthorized people.

In this context, (i) administrative measures (ii) technical measures are taken for protection of personal data, preserving safety and confidentiality and (iii) when necessary, highest level of conformity is aimed as the related processes are audited by Kordsa Global Internal Audit Function,

(iv) measures predicted in Personal Data Protection Law are taken to prevent disclosure of personal data with unlawful means.

### **6.1. Administrative Measures:**

- Employees are trained about protection of personal data and their awareness is provided.
- In the agreements made with the people which personal data is transferred, regulations are made to provide data safety of transferring party.
- The conformity of employees to the law and related policy and procedures prepared in this context is supported with discipline procedure.
- Personal data processing operations which are being carried out by Kordsa are examined in detail and in this context, necessary steps to provide conformity with predicted personal data process conditions are determined.

### **6.2. Technical Measures:**

- Technical measures are taken to the extent permitted by technology in relation to protection of personal data by Kordsa, and the measures taken are updated and improved in parallel with developments.
- Expert personnel in technical matters are employed and external service is provided when necessary.
- Audits are made in regular intervals for application taken measures.
- Data safety is supported via installed software and systems.
- Access authority to personal data being processed in Kordsa is limited with related employees in the direction of the purpose of determined operation.

### **6.3 Audit Operations related to Personal Data Protection:**

- It is audited in regular intervals by Kordsa Global Internal Audit Function whether all kinds of measures or applications with the purpose of providing personal data protection and safety by Kordsa are being applied in a sustainable way, whether it is efficient and in conformity with the Law.
- In case Kordsa deems it necessary, whole audit process or a part of it can be carried out by an external audit company. The results of operations carried out in this context are reported to related function managers, Kordsa PVP Committee, Kordsa CEO and/or Kordsa Board of Directors.
- The regular follow up of actions planned related to audit results is the responsibility of process owners. Kordsa Global Internal Audit Function carries out the follow up of actions, verification tests and audits in the scope of the report.
- Without being limited to audit results, operations that will improve and better the measures taken about data protection is carried out by related functions.

### **6.4 Measures to be taken in case Personal Data is Disclosed with Unlawful Means:**

In case personal data is acquired by unauthorized people via unlawful means during personal data process operations carried out by Kordsa, Kordsa PVP Committee notifies this to Data Owner and Personal Data Protection Council when it is necessary.



**7. TRANSFER OF PERSONAL DATA****7.1. Transfer In Country**

Kordsa can transfer Personal Data to third parties by taking Express Consent of Personal Data Owner and without taking Express Consent in exceptional cases in accordance with the principles in the Law. In this context, Kordsa can transfer personal data to the people groups stated below;

<b>PEOPLE WHOM THE DATA CAN BE TRANSFERRED TO</b>	<b>DESCRIPTION</b>	<b>PURPOSE OF DATA TRANSFER</b>
<b>Business Associate</b>	Parties that Kordsa get into partnership with the purpose of carrying out commercial operations.	It is transferred limitedly to fulfill the purposes of foundation of business association, considering necessity and proportion.
<b>Supplier or Customer</b>	Parties that supply goods/service to Kordsa or Parties that Kordsa supply goods/service in accordance with the order and directions of Kordsa and customers based on agreements in the scope of carrying out commercial operations of Kordsa.	It is transferred with the purpose of planning and carrying out the commercial operations of Kordsa and with the purpose of supplying goods/service from the suppliers or supplying goods/service to customers by considering necessity and proportion.
<b>Subsidiaries</b>	All the companies declared on Kordsa website ( <a href="http://www.kordsa.com">http://www.kordsa.com</a> ) and take place in Kordsa organization.	It is transferred limitedly with the purpose of planning and continuity of commercial operations of Kordsa by considering necessity and proportion.
<b>Hacı Ömer Sabancı Holding A.Ş. and its associated companies</b>	All the companies declared on Sabancı website ( <a href="http://www.sabanci.com">http://www.sabanci.com</a> ) and take place in Sabancı Holding organization.	It is transferred limitedly with the purpose of planning, continuity and audit of commercial operations of Kordsa by considering necessity and proportion.
<b>Legally Capable Public Institutions and Organizations</b>	Public Institutions and Organizations which are authorized to collect information and documents from Kordsa according to related regulations	It is transferred limitedly with the purpose of the demand of related public institutions and organizations with their legal capability by considering

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		necessity and proportion.
<b>Legally Capable Private Entity</b>	Private entities which are authorized to collect information and documents from Kordsa according to related regulations	It is transferred limitedly with the purpose of the demand of related private entities with their legal capability by considering necessity and proportion.

**POLICY DOCUMENT**

**7.2 Transfer to Abroad**

Personal data are transferred (I) in accordance with personal data process purpose and reasons, (ii) if the country to be transferred is one of the countries which have sufficient protection which is declared by Personal Data Protection Council; or in case there isn't necessary protection available in that foreign country, on condition that related foreign country data supervisors guarantee sufficient protection in writing and with the permission of Personal Data Protection Council.

**8. PERSONAL DATA AND DATA CATEGORIES**

In case personal data of real persons in the scope of PVP Policy such as the major ones mentioned in the following are required by Kordsa, they are able to be processed partially or completely in a non-automatic way.

<b>Personal Data Categories</b>	
<b>Personal Identifying information</b>	Documents such as driving license, identity card, passport that contain information such as photograph, name-surname, T.R. Identity number, nationality, name of mother-father, birth place, date of birth, gender and information such as tax number, social security number, signature information, vehicle plate.
<b>Contact Information</b>	Personal information which are used for communication such as telephone number, address, e-mail.
<b>Employee Candidate Information</b>	Personal data related to individuals who are applied as Kordsa employee and evaluated as employee candidate as required by the practice and righteousness rules of business life according to the needs of Kordsa human resources.
<b>Family Members, Relative Information and Personal File</b>	Personal data about the family members (such as spouse, mother, father, child) and relatives which are kept with the purpose of protecting the benefits of personal data owner whose labor agreement is terminated with Kordsa with any reason and Personal Data which are required to be kept in the personal file for a certain period which is determined by the law and required by practice and righteousness rules of business life.
<b>Physical Location, Security Information</b>	Personal data related to records and documents taken during entrance to a physical location or staying in the physical location: Camera records, finger print records and records taken at security point.
<b>Process Safety Information</b>	Personal data such as IP information, login records which processed during the use internet-based software and personal data which is processed for providing technical, legal and commercial security of personal data owner or Kordsa as Kordsa carries out its commercial operations.
<b>Financial Information</b>	Personal data such as personal data processed related to information, document and records and bank account number, IBAN, credit card information, income information which are created in the scope of legal

<b>KC</b>		relation between Kordsa and personal data owner.
	<b>Legal Transaction and Harmonization Information</b>	Personal data which are processed in the scope of harmonization of determination of and rights, tracking and exercise of debts of Kordsa and/or Sabancı Holding and legal responsibilities with Kordsa policies.
	<b>Audit and Inspection Information</b>	Personal data which are processed in the scope of harmonization of legal responsibilities and policies of Sabancı Holding and Kordsa
	<b>Special Quality Personal Data</b>	Data related to race, origin, political view, philosophical thought, religion, sect or other beliefs, dress, society, foundation or union membership, health, sexual life, conviction and safety precautions, and biometric and genetic data.
	<b>Demand/Complaint Management Information</b>	Personal data related to receipt and evaluation of all kinds of demand and complaint directed at Kordsa
	<b>Reputation Management Information</b>	Personal data which is associated with person and is collected to protect the business reputation of Kordsa (such as Post and shares about Kordsa or Sabancı Holding)
	<b>Event Management Information</b>	Information or assessment which are associated with personal data owner and are collected related to events which have potential to affect Kordsa employees and shareholders (such as information and assessment collected related to leading public or investors correctly)

## 9. DISPOSAL OF PERSONAL DATA

Even though being processed in accordance with the provisions of law, except the obligations that arise from laws, in case the reasons to process the data cease to exist, personal data is disposed by Kordsa in accordance with the regulations automatically or upon the request of the related person.

## 10. RIGHTS OF PERSONAL DATA OWNERS AND REFERRING TO DATA SUPERVISOR

### 10.1 Rights of Personal Data Owners:

In regard of gathered personal and special quality personal data of Data Owners by Kordsa, Data Owners have right to;

- Learn whether their personal data is processed or not, and to demand information if processed.
- Learn whether their personal data are used relevantly or not,
- Learn who are the third parties the data transferred to in the country or at abroad if any,
- Demand the correction of personal data if it is missing or wrong and demand that the transaction carried out in this context is notified to third parties who the data is transferred to,
- Demand the disposal of processed data in case the reasons that requires personal data process cease to exist and demand notification of this demand to third parties who the data is transferred to,
- Object to a result against himself/herself that arise from analyzing of data exclusively by automatic systems,
- Demand to compensation of damages in case he/she suffer damages due to process of data unlawfully.

## 10.2 Application to Data Supervisor

**Reserving the other methods which will be determined by PVP Council, Data Owners are obligated to make their applications to Data Supervisors in writing in accordance with the Law. Related people will be able to deliver their demands related to rights stated above by using the application form in the annex of this Policy to Kordsa who is the Data Supervisor. Accordingly, Personal Data Owner application can be sent to e-mail address with an electronic signature or documents that prove their identity and signature or can be delivered in person with a petition with wet signature or can be sent through notary.**

Data Supervisor: **Kordsa Teknik Tekstil A.S.**

E-mail: [veri.sorumlusu@kordsa.com](mailto:veri.sorumlusu@kordsa.com)

Mail address for delivery in person or through notary: **Alikahya Fatih Mahallesi Sanayici Caddesi, No:90, Izmit Kocaeli**

**Kordsa with the title of Data Supervisor replies to demands of data owners related to personal data in thirty (30) days at most according to the nature of the demand and for free of charge as a rule. In case the demand requires an additional cost, the fee which is determined by PVP Council will be reflected to Data Owner.**

Kordsa has right to accept or reject the demand by explaining the reason after examining the demand. The reason of rejection is notified to applicant in writing or in electronic environment. In case the demand is accepted, Kordsa carries out what the demand requires.

Kordsa can demand some additional information/documents and ask some questions to exercise the right of the person who make the application in the scope of providing data, in accordance with Kordsa policy/procedures and/or provisions of the Law.

The demand can be rejected by Kordsa by stating the reason in case the application of Data Owner has possibility to obstruct the rights or freedoms of other people, requires unreasonable effort or if the information is public.

## **11. CIRCUMSTANCES IN WHICH DATA OWNERS CANNOT EXERCISE THEIR RIGHTS**

**11.1.** In case the following reasons exist, data owners have no right to make any demands in accordance with regulations of Law.

- In case the personal data is processed with purposes art, historic literature or scientific purposes or in the scope of freedom of expression in case it doesn't violate national defense, national security, public safety, economic security, confidentiality of private life or personal rights or doesn't constitute a crime.
- In case the personal data is processed with the purposes of research, planning and statistics by making them anonymous with formal statistic.
- In case personal data is processed in the scope of preventive, protective and informative operations which are carried out by public institutions and organizations which are authorized and assigned by law related to provide national defense, national security, public safety, public order or economic safety,

- In case personal data is processed by judicial offices or prosecution authorities related to investigation, prosecution, trial or execution transactions.

**11.2 In case of the conditions stated in the following exist, personal data owners cannot claim their rights in scope of the Law except demanding compensation of damages;**

- Personal data is required to prevent crime or for a crime investigation,
- If personal data which is processed is made public by the Data Owner,
- Personal data process is required to carry out audit and regulation duties and disciplinary investigation and prosecution by professional organizations with public institution status and authorized public institutions and organizations which are authorized by the law.
- Personal data process is required to protect the financial interests of the government related to budget, tax and financial affairs.

**12. REVIEW**

This PVP Policy is reviewed by Kordsa whenever it is deemed necessary after the date it is issued and revised. This Policy can be amended by the approval of CEO.