

PANDA ALÜMİNYUM A.Ş.
CLARIFICATION TEXT ON THE PROCESSING OF PERSONAL DATA

This clarification text has been prepared under Article 10 of the Personal Data Protection Law No. 6698 ("PDPL") in order to clarify the data subjects regarding the processing of personal data collected in Panda Alüminyum A.Ş. ("Company") through various channels.

The company attaches great sensitivity and effort regarding the processing, protection and security of personal data.

Personal data may be collected by the Company through all kinds of verbal, written or electronic methods. In this context and under the PDPL, the personal data of all relevant persons can be processed by the Company as Data Controller.

1. PERSONAL DATA PROCESSED BY THE COMPANY

The Company processes the identity, contact, professional experience, health, criminal conviction and security measures data and some biometric data. These data may belong to the shareholders/partners, employees, employee relatives, employee candidates, interns, trainers, real persons who are customers and sellers of goods and services, employees and officials of legal entities, users and potential customers and visitors. The personal data processed by the Company varies depending on the data subject group.

2. PURPOSES IN PROCESSING OF PERSONAL DATA

Personal data are processed within the framework of the personal data processing conditions specified in Articles 5 and 6 of the PDPL and the purposes specified in the PDPL and for the purposes specified below, without limitation. Accordingly, the purpose of processing personal data are as follows;

1. Carrying out the management activities of the company,
2. Carrying out company activities under the legislation,
3. Ensuring the physical space security of the company,
4. Giving information to authorized persons or organizations,
5. Carrying out the necessary studies in order to provide the maximum benefit for the customers in the services offered by the company,
6. Planning and execution of the corporate communication activities of the company,
7. Ensuring the legal and commercial security of the company and its business partners,
8. Continuing the commercial activities and strategies of the company,
9. Conducting the company's contract and legal affairs processes,
10. The management of the company's human resources, training and employment policies.

The Company takes all necessary legal, technical and administrative measures in order to prevent the unlawful processing of personal data and illegal access to the data and to protect the personal data securely.



3. SHARING AND TRANSFERRING OF PERSONAL DATA

Following the processing conditions and data processing purposes and within the framework of the conditions specified in Articles 8 and 9 of the Law, the personal data can be shared with the authorized institutions and organizations, business partners, service providers, relevant persons, judicial authorities and security units in order to continue commercial activities, to meet customer demands, to provide the best service to customers and to fulfill legal obligations.

The company takes all necessary security measures to protect personal data in case personal data are shared.

4. THE METHODS AND LEGAL GROUNDS OF COLLECTION OF PERSONAL DATA

The company may collect personal data in any verbal, written and electronic environment. Personal data are collected within the framework of the purposes specified in this clarification text, in order to provide services per the laws and relevant legislation, to fulfill the Company's obligations arising from contracts and laws, to manage employment policies and to carry out personnel recruitment processes. Personal data are collected automatically or in non-automatic ways, provided that they are part of any data recording system, based on one or more of the legal reasons specified in Article 5 of the Law, are processed, shared and transferred per the conditions specified in the Law.

5. THE RIGHTS OF DATA SUBJECTS AND PROTECTION OF THESE RIGHTS

Under Article 11 of PDPL, data subjects have the following rights:

1. to learn whether his/her personal data are processed or not,
2. to request information if his/her personal data are processed,
3. to learn the purpose of his/her personal data processing and whether this personal data is used for intended purposes,
4. to know the third parties to whom his/her personal data is transferred at home or abroad,
5. to request the rectification of the incomplete or inaccurate data, if any,
6. to request the erasure or destruction of his/her personal data under the conditions laid down in Article 7 of PDPL,
7. to request notification of the transactions made according to Articles 5 and 6 to third parties to whom personal data have been transferred,
8. to object to the processing, exclusively by automatic means, of his/her personal data, which leads to an unfavorable consequence for the personal data subject,
9. to request compensation for the damage arising from the unlawful processing of his/her personal data.

The data subject shall make the requests relating to the implementation of this Law to the data controller in writing or by other means to be determined by the Personal Data Protection Board. The data controller shall conclude demands in the request within the shortest time by taking into account the nature of the demand and at the latest within thirty days.

The demands are free of charge. However if the action requires an extra cost, fees may be charged in the tariff determined by the Personal Data Protection Board.

6. CONTACT INFORMATION

Detailed information regarding the matters within the scope of this clarification text is provided by the Company in the "Personal Data Protection and Processing Policy" (in Turkish) which may be accessed from www.pandaalu.com.

You may submit your requests regarding your rights mentioned above at kykk@pandaalu.com.tr or pandaalm@hs02.kep.tr addresses or from our address below in the written form.

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