

## **I. Identity of the Data Controller**

This Clarification Text has been prepared by Gelişim Tekstil San. ve Tic. A.Ş. (“Gelişim Tekstil” or “Company”) as Data Controller pursuant to Article 10 titled “Data Controller’s Obligation to Inform” of the Law no. 6698 on the Protection of Personal Data and the Communiqué on the Procedures and Principles to be Complied With in the Fulfillment of the Obligation to Inform. With this “Information” letter we have prepared acting as Data Controller, we would like to inform you regarding the persons to whom your personal data may be transferred and the purpose thereof, the method and legal reason for the collection of your personal data and your other rights enumerated in Article 11 of the Law on the Protection of Personal Data.

Acting in our capacity as Data Controller, we process, record, transfer, share and store your personal data as explained hereinbelow and within the framework of the official regulatory limits.

Our Company reserves its right to update this “Clarification Text on the Protection of Personal Data” within the framework of the changes to be made in the official legislation in effect.

**Gelişim Tekstil San. ve Tic. A.Ş.**

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## **II. Purpose of the Policy to Protect and Process Personal Data**

Your written or electronic personal data is collected and processed by our Company conducting activity in the areas detailedly specified in its Articles of Association pursuant to the regulations issued by the relevant authorities and in accordance with the agreements we have executed. Your personal data shall be used for the purpose of providing the services related to our company’s subjects of activity and increasing the quality of these services, conducting our company’s sales, marketing and other activities, as well as complying with the obligations of information storage, reporting and giving information.

Your personal data shall not be used for any purpose other than those specified hereinabove without your explicit consent and except the legal obligations and the governmental authorities/corporations, the same shall not be shared with, or transferred to, any third persons.

Our Company shall only share your personal data based on the customers’ explicit consent or in cases stipulated in article 5/f.2 of the Law on the Protection of Personal Data and especially in the legislation governing us, for the purpose of providing value added services, opportunities and possibilities, and increasing the service quality with our affiliates both in Turkey and abroad, our directly or indirectly affiliated companies and our joint ventures or the public authorities or organizations authorized to request such data pursuant to the statutory obligation, as well as the institutions, suppliers, competent sellers/dealers/business partners both in Turkey and abroad with which we have an agreement for the conduction of our activities, provided that sufficient measures are taken.

Especially for the above mentioned purposes and in direct proportion to the below mentioned purposes, the personal data may be processed within the framework of personal data processing conditions as provided for in articles 4, 5 and 6 of the Law:

- Planning and Execution of Emergency Situation Management Processes;
- Planning, Supervision and Execution of Information Security Processes;
- Conduction of Candidate Employee/Probationer/Student Selection and Placement Processes;
- Conduction of the Processes of Application by Candidate Employees;

- Fulfillment of the Obligations for the Employees Arising from the Employment Contract and the Legislation;
- Conduction of the Processes of the Employees' Fringe Benefits and Interests;
- Conduction of the Employee Satisfaction and Commitment Processes;
- Conduction of the Supervision/Ethical Activities;
- Conduction of the Activities in Compliance with the Legislation;
- Conduction of the Financial and Accounting Affairs;
- Ensuring Physical Location Control and Security;
- Conduction of Assignment Processes;
- Tracing and Execution of Legal Affairs;
- Conduction of Communication Activities;
- Planning the Processes of Human Resources;
- Conduction of Occupational Health/Safety Activities;
- Conduction and Supervision of Business Activities;
- Planning and/or Execution of Ensuring Business Continuity Activities;
- Marketing/Analysis Studies\*\*;
- Planning and Execution of the Relevant Processes for the Purpose of Obtaining Utmost Benefit from the Products or Services Provided by the Company;
- Administration of the Supply Chain Management Processes;
- Activities Concerning the Procurement Processes of the Products and Services;
- Rendering of After-Sale Support Services for the Products and Services;
- Planning and Execution of Market Research Activities for the Sale and Marketing of the Products and Services;
- Planning and Execution of the Sales Processes of the Products and/or Services;
- Conduction of the Production and Operation Processes of the Products and Services;
- Establishment and/or Tracing of the Allocation and/or Evaluation Processes of the Products and/or Services;
- Execution of the Marketing, Promotion, Alteration and Maintenance Services Concerning the Products and/or Services\*\*;
- Ensuring that the Data is true and up-to-date;
- Giving Information to the Competent Persons, Authorities and Organizations;
- Conduction of the Management Activities;
- Establishment and Tracing of Visitors' Records.

The purposes signed as \*\* mean the processing purposes to be realized within the scope of the explicit consents of the customers.

### **III. Principles of the Personal Data Protection and Processing Policy**

Your personal data is processed by Gelişim Tekstil in its capacity of Data Controller within the framework of the following principles.

- **Processing in Compliance With the Law and Good Faith Rules**

In processing your personal data, our company complies with the principles brought based on the legal arrangements, as well as complying with the general confidence and good faith rule.

- **Ensuring Accuracy and Being Up-To-Date, Where Necessary**

Taking into consideration your legitimate interests, periodic controls and updatings are made and the necessary measures are taken in this direction. Within this scope, systems intended to control the accuracy of the personal data and to make the necessary corrections are established within the organization of Gelişim Tekstil.

- **Processing for Definite, Explicit and Legitimate Purposes**

Your personal data is processed based on the explicit, definite and legitimate data processing purposes.

- **Ensuring that the Same is Related, Limited and Proportionate to the Purpose for which it is Processed**

Your personal data is processed in a manner which is proportionate, related and limited to the accomplishment of the envisaged purpose/purposes and our company refrains from processing the personal data which has no relation with the accomplishment of the purpose or which is not needed.

- **Ensuring that the Same is Maintained for the Time Period Which is Stipulated in the Relevant Legislation or Which is Necessary for the Purpose in relation to Which it is Processed**

Your personal data is maintained only for the time period which is stipulated in the relevant legislation or which is necessary for the purpose in relation to which it is processed. Within this scope, firstly, it is determined whether a duration is stipulated for the personal data storage in the relevant legislation and if this duration is determined therein, this duration is observed or if this duration has not been determined, the personal data is maintained for a time period which is necessary for the purpose in relation to which it is processed. Upon expiration of the duration or the ending of causes requiring the processing and if there is no legal reason allowing the processing for a longer period, your personal data is erased, destroyed or anonymized in accordance with Gelişim Tekstil's Policy Concerning the Protection and Processing of Personal Data.

#### **IV. Types of Processing Personal Data**

Pursuant to the Law no. 6698 on the Protection of Personal Data, your personal data you have shared may be processed by us as a whole or in part through the acquisition, recording, storage, altering, rearranging and carrying out all kinds of transaction on the data after having obtained the same automatically or unautomated ways, provided that the same is a part of any data recording system. Any and all processes realized on the data within the scope of the Law on the Protection of Personal Data is accepted as the "processing of personal data".

#### **V. Personal Data Collection Methods and Legal Reasons Thereof**

Gelişim Tekstil San. ve Tic. A.Ş. collects the personal data from the electronic/digital medium such as the company's web address, social media accounts and e-mail address, directly from the customers, the services from which the customers benefit for the realization of the necessary improvements in the services in the direction of the customers' needs, from the potential customer candidates themselves, through our solution partners and other business partners ensuring the use of our Company's services by our customers; and the data learned orally, electronically or in writing through the facsimile messages and the notifications coming from the administrative and financial authorities in the direction of the following legal reasons as specified in articles 5 and 6 of the Law:

- Your explicit consent we have received from you when necessary (for example: commencement of communication for the purpose of marketing, promotion and alteration services related to the products and/or services);
- Explicitly stipulation of the processing of your personal data in the laws (for example: situations such as the processing of the information included in the product and/or service invoices);
- The fact that the processing of the personal data pertaining to you is necessary, provided that a contractual relationship is established with you or if the same is directly related to our obligation to perform arising from the contract;
- Situations which are compulsory for enabling us to fulfill our legal obligation;
- Sharing of your personal data by yourself (for example: situations where you come into contact with our company regarding your claims and complaints);

- If it is compulsory for us to process the data pertaining to you, provided that your fundamental rights and freedoms are not violated (for example: in case where a legal dispute arises, maintenance of your data by us during the lapse of time);
- Situations where the personal data is made available to the public by the person concerned.

## **VI. Processing of the Personal Data of Special Nature**

Pursuant to the Law on the Protection of Personal Data, the data pertaining to the persons concerning 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 are deemed to be personal data of special nature. In processing the personal data of special nature, our Company takes the measures determined by the Personal Data Protection Board sufficiently. In order to render better service, our Company shall process the persons' data of special nature only by obtaining the consent of the person concerned and only for the collection purpose.

## **VII. To Whom and For Which Purpose the Personal Data Processed May be Transferred?**

Your personal data collected by Gelişim Tekstil San. ve Tic. A.Ş. shall be transferred, for the accomplishment of the purposes specified in Article II of the Clarification Text and the realization of these purposes only, to our Business/Solution Partners resident in Turkey and/or abroad, the Company's authorized officials, our Suppliers, competent public/private institutions, private entities or organizations and the third persons authorized by the law, and may be processed in Turkey and abroad, provided that the same is limited to the conditions for the processing of personal data as specified in articles 8 and 9 of the Law and for the above mentioned purposes.

In addition to the explanations specified hereinabove, the personal data may be transferred to the foreign countries having sufficient protection as declared by the Board in the existence of any one of the above mentioned conditions. In the non-existence of sufficient protection, the personal data may be transferred to the foreign countries for which the data controllers in Turkey and the related foreign country guarantee sufficient protection in writing and the Board has authorized such a transfer in the direction of the data transfer conditions stipulated in the legislation.

## **VIII. Data Subjects' Rights Enumerated in Article 11 of the Law on the Protection of Personal Data**

Within this scope, the data subjects have the right:

- To learn whether the personal data is processed or not;
- To request information if his/her personal data is processed;
- To learn the purpose of the data processing and whether the data is used for intended purposes;
- To know the third persons to whom the personal data is transferred at home or abroad;
- To request the correction of the incomplete or inaccurate personal data, if any;
- To request the erasure or destruction of the personal data within the framework of the conditions stipulated in article 7 of the Law on the Protection of Personal Data;
- To request notification of the operations carried out pursuant to article 7, sub-paragraphs (d) and (e) of the Law on the Protection of Personal Data to the third persons to whom the personal data has been transferred;
- To raise objection to the processing, exclusively by automatic means, of the personal data, which leads to an unfavourable consequence for the data subject;
- To request compensation for damage arising from the unlawful processing of the personal data.

### **IX. Time Periods During Which your Personal Data May be Processed**

In compliance with the Law on the Protection of Personal Data, your personal data processed for the purposes specified in this “Clarification Text Concerning the Processing of Personal Data” shall be erased, destructed or continue to be used by us after having been anonymized when the purpose requiring the processing thereof pursuant to article 7/f.1 of the Law on the Protection of Personal Data ceases to exist and/or the lapse of time periods during which we are obliged to process your data pursuant to the legislation have ended.

### **X. Situations Where our Company May Process your Personal Data Without your Explicit Consent Pursuant to the Laws**

Pursuant to article 5 of the Law on the Protection of Personal Data, our Company may process your personal data specified hereinabove and acquired in compliance with the Law without seeking your explicit consent.

Situations explicitly envisaged in the Laws:

- If it is mandatory to process your personal data for the protection of life or physical integrity of the person or of any other person who is bodily incapable of giving his/her consent or whose consent is not deemed legally valid;
- If it is necessary to process the personal data pertaining to the contracting parties, provided that the same is directly related to the execution or performance of an agreement you have executed with our Company and its related companies/corporations and the other real and/or legal entities specified in Article III of the Clarification Text;
- If it is compulsory for enabling our Company to fulfill its legal obligation;
- If your personal data is made available to the public by yourself;
- If the data processing is mandatory for the establishment, exercise or protection of any right;
- If the data processing is mandatory for the legitimate interests of our Company, provided that your fundamental rights and freedoms are not violated.

### **XI. Situations Where our Company May Process your Personal Data of Special Nature Without your Explicit Consent Pursuant to the Laws**

Our Company may process the personal data of special nature, except those related to the health and sexual life, without seeking explicit consent of the person concerned within the scope of the articles hereinabove. Personal data relating to health and sexual life may only be processed, without seeking explicit consent of the data subject, by any person or authorised public institutions and organizations that have confidentiality obligation, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing.

### **XII. Technical and Administrative Measures Taken For the Purpose of Ensuring Security of Personal Data**

Gelişim Tekstil undertakes to take all of the necessary technical and administrative measures and to exercise due diligence for the purpose of ensuring the confidentiality, integrity and security of your personal data.

Gelişim Tekstil takes the necessary measures in order to prevent any unauthorized access to the personal data and the processing, disclosure, alteration or destruction of the personal data contrary to

the law. In the processing of personal data, Gelişim Tekstil uses the generally accepted security standards such as fire walls and Safe Socket Layer (SSL) encrypting.

In order to prevent any unlawful access to the personal data processed by itself, to prevent an unlawful processing of this data and to ensure the safeguarding of the personal data; Gelişim Tekstil:

- Establishes and applies access authorization and control matrixes intended for its employees in order to ensure that the personal data collected is not processed contrary to the Law;
- Ensures that penetration tests are made periodically and tests the system's resistance to the unauthorized access in order to prevent any unlawful access to the personal data;
- Ensures that the data in printed paper is stored in the lockers without fail, as well as ensuring that only the authorized persons gain access to them.

In cases where the personal data is damaged or acquired by unauthorized third persons as a result of the attacks to the platforms operated by Gelişim Tekstil or the system of Gelişim Tekstil despite the fact that Gelişim Tekstil has taken the necessary information security measures, Gelişim Tekstil shall promptly inform this fact to you and the Personal Data Protection Board, as well as taking the necessary measures.

### **XIII. In Order to Make a Request Pursuant to the Law on the Protection of Personal Data:**

Pursuant to article 13, sub-paragraph 1 of the Law on the Protection of Personal Data, you may communicate your request concerning the exercising of your rights specified hereinabove to our Company in writing or through the method(s) to be determined by the Personal Data Protection Board.

The applications to be made in writing may be communicated to us by filling out the "Application Form for the Persons Whose Data is Processed":

- Through personal application of the applicant;
- Via a notary public;
- By the Applicant, sending the same bearing the safe electronic signature defined in the Electronic Signature Law no. 5070 from the Applicant's registered mail address to the Company's registered mail address ([gelistimtekstil@hs02.kep.tr](mailto:gelistimtekstil@hs02.kep.tr)) or the address [kvkk@gelistimtekstil.com.tr](mailto:kvkk@gelistimtekstil.com.tr).

In matters related to your personal data, only the address [gelistimtekstil@hs02.kep.tr](mailto:gelistimtekstil@hs02.kep.tr) or the address [kvkk@gelistimtekstil.com.tr](mailto:kvkk@gelistimtekstil.com.tr) should be used and the requests and notifications coming from any address other than this address shall not be received for consideration.

The rights related to the personal data may be exercised only for the data pertaining to the persons themselves. The requests related to the data of the persons other than the person who has filled out the Form with an annex containing identity determining official documents shall not be taken into consideration. Even if the data erasure requests are met, we would like to present for your information that we are obliged to share data with the public authorities if so requested by the public authorities.

In case where your requests are communicated to us using the specified methods, the Company shall, depending on the nature of your request, conclude your request as soon as possible, but not later than thirty (30) days on free of charge basis. If, however, the transaction requires an additional cost, the Company shall receive a fee included in the tariff determined by the Personal Data Protection Board.

#### **XIV. Conditions for Erasure, Destruction or Anonymizing of Personal Data**

Pursuant to articles 7 and 17 of the Law on the Protection of Personal Data and article 138 of the Turkish Criminal Law, Gelişim Tekstil maintains the personal data it has processed for the time periods as stipulated by the relevant laws and/or the time periods as required by the processing purpose. Upon expiration of these time periods, it shall erase, destroy or anonymize the relevant data in accordance with the Regulation Concerning the Erasure, Destruction or Anonymizing of Personal Data.

Erasure of the personal data by Gelişim Tekstil means an operation ensuring that the personal data cannot be accessed and reused by the relevant users in any manner whatsoever. For this purpose, Gelişim Tekstil establishes and applies an authorization and control matrix at user level, as well as taking the necessary measures for the realization of the erasing operation on the database.

Destruction of the personal data by Gelişim Tekstil means an operation ensuring that the personal data cannot be accessed, restored and reused by any person in any manner whatsoever.

Anonymization of the personal data by Gelişim Tekstil means an operation ensuring that the personal data cannot be identified with a real person, whose identity is definite or determinable, in any manner whatsoever even if it is matched with other data.

Gelişim Tekstil explains the methods concerning the erasure, destruction and anonymization in detail, as well as detailedly explaining the technical and administrative measures it has taken within the scope of the Personal Data Storage and Destruction Policy it has prepared in compliance with the Regulation Concerning Erasure, Destruction and Anonymization of Personal Data. Furthermore, the time period stipulated by the Regulation for the realization of the periodic destruction has been determined as **6 months** in this Policy.

#### **XV. Changes to be Made in the Personal Data Protection and Processing Policy**

Gelişim Tekstil may at any time make a change in this Personal Data Protection and Processing Policy. These changes shall promptly become valid concurrently with the publication of the changed new Personal Data Protection and Processing Policy. The necessary notification shall be made in order for enabling you to be informed regarding the changes in this Personal Data Protection and Processing Policy.