

## CLARIFICATION TEXT REGARDING THE PROCESSING OF PERSONAL DATA FOR POTENTIAL SUPPLIER REPRESENTATIVES

**Data Controller:** Nitromak Dnx Kimya Sanayii A.Ş.

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As Nitromak Dnx Kimya Sanayii A.Ş. ("**Nitromak**"), the Data Controller; we hereby prepared this Clarification Text to inform you, **our supplier's representative**, about the processing of your personal data as per the scope of the Law on the Protection of Personal Data No. 6698 ("**PDPL**"), the Communiqué on the Procedures and Principles to be Complied with in Fulfilling the Obligation of Disclosure and the relevant legislation.

### 1. Which of your Personal Data is Processed?

ID Information	
Processed Personal Data	<ul style="list-style-type: none"><li>• Name surname</li><li>• Signature</li><li>• Turkish Identity Number</li><li>• Passport number</li><li>• Tax identification number</li><li>• Tax Administration</li><li>• Supplier Number</li><li>• Signature Circulars</li><li>• Signature statement</li><li>• Trade Registry Number</li><li>• Trade Registry Gazette Information</li><li>• Vehicle License Plate Information</li><li>• Vehicle License Information</li><li>• Photograph</li><li>• Power of attorney</li><li>• Population Registration Information</li><li>• SRC number 5</li><li>• SSI Registration Number</li><li>• Father name</li><li>• Place of birth</li><li>• Date of birth</li><li>• Driver's License Photocopy</li><li>• Copy of Identity Document</li><li>• Vehicle License Photocopy</li><li>• Vehicle Inspection Report</li><li>• K Certificate of Authority</li><li>• ADR Certificate of Conformity</li></ul>

	<ul style="list-style-type: none"> <li>● Insurance policy</li> <li>● Vehicle type</li> <li>● Vehicle Model</li> <li>● Offer No.</li> </ul>
<p><b>Purposes of Processing Personal Data</b></p>	<ul style="list-style-type: none"> <li>● Execution / Supervision of Business Activities</li> <li>● Ensuring the Security of Movable Property and Resources</li> <li>● Execution of Information Security Processes</li> <li>● Providing Physical Structure Security</li> <li>● Execution of Access Authorizations</li> <li>● Execution of Goods / Services Production and Operation Processes</li> <li>● Execution of Goods / Services Procurement Processes</li> <li>● Execution of Finance and Accounting Affairs</li> <li>● Follow-up and Execution of Legal Affairs</li> <li>● Execution of Contract Processes</li> <li>● Conducting Training Activities</li> <li>● Fulfilling Employment Contract and Legislative Obligations for Employees</li> <li>● Execution of Employee Satisfaction and Loyalty Processes</li> <li>● Execution of Marketing Processes of Products / Services</li> <li>● Execution of Advertising / Campaign / Promotion Processes</li> <li>● Organization and Event Management</li> <li>● Execution of Communication Activities</li> <li>● Execution of Risk Management Processes</li> <li>● Execution of Occupational Health / Safety Activities</li> <li>● Execution of Activities in Compliance with the Legislation</li> <li>● Execution of Emergency Management Processes</li> <li>● Ensuring the Security of Data Controller Operations</li> <li>● Execution of Supply Chain Management Processes</li> <li>● Conducting Audit / Ethical Activities</li> <li>● Execution of Logistics Activities</li> <li>● Execution of Good / Service Sales Processes</li> </ul>
<p><b>Legal Reasons for Processing Personal Data</b></p>	<p>Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:</p> <ul style="list-style-type: none"> <li>● Provided that it is directly related to the establishment or performance of a contract, based on the legal reason that the processing of personal data belonging to the parties to the contract is necessary, for the purposes of execution/ supervision of business activities, ensuring the security of movable property and resources, execution of information security processes, providing physical structure security, execution of access authorizations, execution of goods/ services procurement processes, execution of finance and accounting affairs, follow-up and execution of legal affairs,</li> </ul>

execution of contract processes, conducting training activities, fulfilling employment contract and legislative obligations for employees, execution of employee satisfaction and loyalty processes, execution of marketing processes of products/ services, execution of advertising/ campaign/ promotion processes, organization and event management, execution of communication activities, execution of occupational health/safety activities, execution of activities in accordance with the legislation, execution of supply chain management processes, execution of risk management processes, execution of logistics activities, execution of goods/service sales processes,

- Based on the legal reason that it is expressly provided for by the laws, for the purposes of execution of occupational health and safety activities, execution of activities in accordance with the legislation, execution of emergency management processes,
- Based on the legal reason that it is mandatory for the data controller to fulfill its legal obligation, for the purposes of execution of financial and accounting affairs, follow-up and execution of legal affairs, execution / supervision of business activities, execution of occupational health / safety activities, execution of activities in accordance with the legislation, ensuring the security of data controller operations, executing supply chain management processes, executing logistics activities, conducting training activities,
- Provided that it does not harm the fundamental rights and freedoms of the data subject, based on the legal reason that data processing is mandatory for the legitimate interests of the data controller, for the purposes of execution/audit of business activities, execution of goods/service procurement processes, execution of employee satisfaction and loyalty processes, execution of risk management processes, execution of occupational health/safety activities, ensuring the security of data controller operations, execution of audit/ethical activities, execution of supply chain management processes, execution of logistics activities,
- Based on the legal reason that data processing is mandatory for the establishment, exercise, or protection of a right., for the reasons of follow-up and execution of legal affairs, execution / supervision of business activities
- Based on the legal reason that the data subject provided their explicit consent, for the purposes of execution/audit of business activities, execution of production and operation processes of goods/services, execution of information

	security processes, execution of access authorizations, execution of marketing processes of products/services, organization and event management, execution of communication activities.
<b>Personal Data Collection Methods</b>	<ul style="list-style-type: none"> <li>● Email</li> <li>● Printed Forms</li> <li>● Electronic Forms</li> <li>● Spreadsheets</li> <li>● Via information systems and electronic devices (data collected without any form – eg: access logs, etc.)</li> <li>● Agreement</li> <li>● Power of attorney</li> <li>● Commitment</li> <li>● Warning Letter</li> <li>● Case Files</li> <li>● Executive Files</li> <li>● Information and documents declared by the Data Subject</li> <li>● Record book</li> </ul>

<b>Contact Information</b>	
<b>Processed Personal Data</b>	<ul style="list-style-type: none"> <li>● Mobile number</li> <li>● E-mail address</li> <li>● Address</li> <li>● Phone number</li> <li>● Business Address</li> <li>● Business Phone Number</li> <li>● Fax Number</li> <li>● Radio Channel</li> <li>● Contact Person Information</li> </ul>
<b>Purposes of Processing Personal Data</b>	<ul style="list-style-type: none"> <li>● Execution of Information Security Processes</li> <li>● Execution of Access Authorizations</li> <li>● Execution / Supervision of Business Activities</li> <li>● Ensuring the Security of Movable Property and Resources</li> <li>● Execution of Goods / Services Procurement Processes</li> <li>● Execution of Finance and Accounting Affairs</li> <li>● Follow-up and Execution of Legal Affairs</li> <li>● Execution of Contract Processes</li> <li>● Execution of Employee Satisfaction and Loyalty Processes</li> <li>● Execution of Marketing Processes of Products / Services</li> <li>● Execution of Advertising / Campaign / Promotion Processes</li> <li>● Organization and Event Management</li> <li>● Execution of Communication Activities</li> </ul>

	<ul style="list-style-type: none"> <li>● Execution of Occupational Health / Safety Activities</li> <li>● Execution of Activities in Compliance with the Legislation</li> <li>● Execution of Emergency Management Processes</li> <li>● Execution of Supply Chain Management Processes</li> <li>● Execution of Logistics Activities</li> </ul>
<p><b>Legal Reasons for Processing Personal Data</b></p>	<p>Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:</p> <ul style="list-style-type: none"> <li>● Provided that it is directly related to the establishment or performance of a contract, based on the legal reason that the processing of personal data belonging to the parties to the contract is necessary, for the purposes of Execution/audit of business activities, ensuring the security of movable property and resources, execution of information security processes, execution of access authorizations, execution of goods/service purchasing processes, execution of finance and accounting affairs, follow-up and execution of legal affairs, execution of contract processes, execution of marketing processes of products/ services, execution of advertising/ campaign/ promotional processes, organization and event management, execution of communication activities, execution of occupational health/safety activities, execution of activities in accordance with the legislation, execution of supply chain management processes, execution of logistics activities,</li> <li>● Based on the legal reason that it is mandatory for the data controller to fulfill its legal obligation, for the purposes of execution of financial and accounting works, execution of occupational health / safety activities, execution of activities in accordance with the legislation,</li> <li>● Based on the legal reason that it is expressly provided for by the laws, for the purposes of execution of occupational health and safety activities, execution of activities in accordance with the legislation, execution of emergency management processes,</li> <li>● Provided that it does not harm the fundamental rights and freedoms of the data subject, based on the legal reason that data processing is mandatory for the legitimate interests of the data controller, for the purposes of execution of employee satisfaction and loyalty processes, execution of supply chain management processes, execution of goods/service procurement processes,</li> <li>● Based on the legal reason that the data subject provided their explicit consent, execution of information security</li> </ul>

	processes, execution of access authorizations, execution/audit of business activities.
<b>Personal Data Collection Methods</b>	<ul style="list-style-type: none"> <li>● Printed Forms</li> <li>● Electronic Forms</li> <li>● Email</li> <li>● Contract</li> <li>● Power of attorney</li> <li>● Warning Letter</li> <li>● Information and documents declared by the Data Subject</li> </ul>

<b>Location Information</b>	
<b>Processed Personal Data</b>	<ul style="list-style-type: none"> <li>● Vehicle Tracking System Location Information</li> <li>● GPRS Vehicle Tracking System User Name and Password Information</li> </ul>
<b>Purposes of Processing Personal Data</b>	<ul style="list-style-type: none"> <li>● Execution / Supervision of Business Activities</li> <li>● Conducting Audit / Ethical Activities</li> <li>● Execution of Supply Chain Management Processes</li> <li>● Execution of Logistics Activities</li> <li>● Providing Information to Authorized Persons, Institutions and Organizations</li> </ul>
<b>Legal Reasons for Processing Personal Data</b>	<p>Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:</p> <ul style="list-style-type: none"> <li>● Provided that it does not harm the fundamental rights and freedoms of the data subject, based on the legal reason that data processing is mandatory for the legitimate interests of the data controller, for the purposes of execution/supervision of business activities, execution of supply chain management processes, execution of logistics activities, providing information to authorized persons, institutions, and organizations,</li> <li>● Based on the legal reason that the data subject provided their explicit consent, for the purpose of execution/audit of business activities.</li> </ul>
<b>Personal Data Collection Methods</b>	<ul style="list-style-type: none"> <li>● Electronic Forms</li> <li>● Printed Forms</li> <li>● GPRS</li> </ul>

**Personal Information**

<p><b>Processed Personal Data</b></p>	<ul style="list-style-type: none"> <li>● Title</li> <li>● Role</li> <li>● Company</li> <li>● Location and Facility Information</li> <li>● Position</li> <li>● Job Description</li> <li>● Business Name</li> <li>● Entry-Exit Time</li> <li>● Date of start</li> <li>● Title of the company</li> <li>● Alcohol Measurement Test Result</li> <li>● Accident Date and Time</li> <li>● Accident Information</li> <li>● Information in the Progress Payment File</li> <li>● Miles&amp;Smiles Number</li> <li>● Travel Information</li> <li>● Flight Information</li> <li>● Car Rental Information</li> <li>● Accommodation Information</li> </ul>
<p><b>Purposes of Processing Personal Data</b></p>	<ul style="list-style-type: none"> <li>● Execution / Supervision of Business Activities</li> <li>● Ensuring the Security of Movable Property and Resources</li> <li>● Execution of Information Security Processes</li> <li>● Execution of Finance and Accounting Affairs</li> <li>● Execution of Goods / Services Procurement Processes</li> <li>● Execution of Goods / Services Production and Operation Processes</li> <li>● Execution of Access Authorizations</li> <li>● Conducting Educational Activities</li> <li>● Fulfilling Employment Contract and Legislative Obligations for Employees</li> <li>● Execution of Marketing Processes of Products / Services</li> <li>● Execution of Advertising / Campaign / Promotion Processes</li> <li>● Organization and Event Management</li> <li>● Execution of Communication Activities</li> <li>● Execution of Risk Management Processes</li> <li>● Execution of Occupational Health / Safety Activities</li> <li>● Execution of Activities in Compliance with the Legislation</li> <li>● Execution of Emergency Management Processes</li> <li>● Ensuring the Security of Data Controller Operations</li> <li>● Conducting Audit / Ethical Activities</li> <li>● Execution of Supply Chain Management Processes</li> </ul>
<p><b>Legal Reasons for Processing Personal Data</b></p>	<p>Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:</p>

	<ul style="list-style-type: none"> <li>• Provided that it is directly related to the establishment or performance of a contract, based on the legal reason that the processing of personal data belonging to the parties to the contract is necessary, for the purposes of execution/audit of business activities, ensuring the security of movable property and resources, execution of information security processes, execution of goods/service purchasing processes, execution of training activities, fulfilling the obligations arising from employment contracts and legislation for employees, execution of production and operation processes of goods/services, execution of marketing processes of products/services, execution of advertising/campaigns/promotion processes, organization and event management, execution of communication activities, execution of occupational health/safety activities, execution of activities in accordance with legislation, execution of supply chain management processes, execution of risk management processes, execution of finance and accounting affairs,</li> <li>• Based on the legal reason that it is expressly provided for by the laws, for the purposes of execution of occupational health and safety activities, execution of activities in accordance with the legislation, execution of emergency management processes,</li> <li>• Based on the legal reason that it is mandatory for the data controller to fulfill its legal obligation, for the purposes of execution of business activities, execution of activities in accordance with the legislation, ensuring security of operations of the data controller,</li> <li>• Provided that it does not harm the fundamental rights and freedoms of the data subject, based on the legal reason that data processing is mandatory for the legitimate interests of the data controller, for the purposes of execution of risk management processes, execution of occupational health / safety activities, execution/ audit of business activities, ensuring the security of data controller operations, execution of audit / ethical activities, execution of risk management processes,</li> <li>• Based on the legal reason that the data subject provided their explicit consent, for the purposes of execution/audit of business activities, execution of goods/service production and operation processes, execution of information security processes, execution of access authorizations.</li> </ul>
<p><b>Personal Data Collection Methods</b></p>	<ul style="list-style-type: none"> <li>• Printed Forms</li> <li>• Electronic Forms</li> <li>• Email</li> </ul>



	<ul style="list-style-type: none"> <li>● Spreadsheets</li> <li>● Via information systems and electronic devices (data collected without any form – e.g.: access logs, etc.)</li> <li>● Information and documents declared by the Data Subject</li> </ul>
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Professional Experience Information	
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Processed Personal Data	<ul style="list-style-type: none"> <li>● Certificate information</li> <li>● SRC 5 Certificate</li> <li>● Class 1 Certificate</li> <li>● Transporter Security Certificate</li> </ul>
Purposes of Processing Personal Data	<ul style="list-style-type: none"> <li>● Execution of Occupational Health / Safety Activities</li> <li>● Fulfillment of Employment Contract and Legislative Obligations for Employees</li> <li>● Execution / Supervision of Business Activities</li> <li>● Execution of Supply Chain Management Processes</li> <li>● Execution of Logistics Activities</li> <li>● Execution of Goods / Services Procurement Processes</li> </ul>
Legal Reasons for Processing Personal Data	<p>Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:</p> <ul style="list-style-type: none"> <li>● Provided that it is directly related to the establishment or performance of a contract, based on the legal reason that the processing of personal data belonging to the parties to the contract is necessary, for the purposes of execution of occupational health/safety activities, fulfillment of obligations arising from employment contracts and legislation for employees, execution/supervision of business activities, execution of supply chain management processes, execution of logistics activities, execution of goods/service procurement processes,</li> <li>● Based on the legal reason that it is mandatory for the data controller to fulfill its legal obligation, for the purposes of execution/supervision of business activities, execution of supply chain management processes, execution of logistics activities.</li> </ul>
Personal Data Collection Methods	<ul style="list-style-type: none"> <li>● Electronic Forms</li> <li>● Printed Forms</li> <li>● E-Mail</li> </ul>

<b>Legal Transaction Information</b>	
<b>Processed Personal Data</b>	<ul style="list-style-type: none"> <li>● Letter of Dismissal</li> <li>● Letter of Commitment</li> <li>● Letter of Warning</li> <li>● Information in Correspondence with Judicial Authorities</li> <li>● Information in Correspondence with Administrative Authorities</li> <li>● Information in the Case and Enforcement Proceedings</li> </ul>
<b>Purposes of Processing Personal Data</b>	<ul style="list-style-type: none"> <li>● Follow up and execution of legal affairs</li> <li>● Execution / Supervision of Business Activities</li> </ul>
<b>Legal Reasons for Processing Personal Data</b>	<p>Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:</p> <ul style="list-style-type: none"> <li>● Provided that it is directly related to the establishment or performance of a contract, based on the legal reason that the processing of personal data belonging to the parties to the contract is necessary, for the purposes of follow up and execution of legal affairs,</li> <li>● Based on the legal reason that it is mandatory for the data controller to fulfill its legal obligation, for the purposes of follow up and execution of legal affairs, execution/supervision of business activities,</li> <li>● Based on the legal reason, the necessity of data processing for the establishment, use or protection of a right, for the purposes of follow up and execution of legal affairs, execution/supervision of business activities,</li> <li>● Based on the legal reason that the data subject provided their explicit consent, for the purposes of execution/supervision of business activities.</li> </ul>
<b>Personal Data Collection Methods</b>	<ul style="list-style-type: none"> <li>● Electronic Forms</li> <li>● Power of Attorney</li> <li>● Letter of Commitment</li> <li>● Warning Letter</li> <li>● Case Files</li> <li>● Execution Proceedings</li> <li>● Email</li> </ul>

Customer Transaction Information	
Processed Personal Data	<ul style="list-style-type: none"> <li>• Mining Site License Information</li> <li>• Construction equipment records</li> <li>• Land/Sea/Air Vacation Registration Information</li> <li>• Shipment information</li> <li>• Explosives Transport Permit Certificate (Road Permit)</li> </ul>
Purposes of Processing Personal Data	<ul style="list-style-type: none"> <li>• Execution of Finance and Accounting Works</li> <li>• Execution / supervision of business activities</li> <li>• Monitoring and execution of legal affairs</li> <li>• Execution of contract processes</li> <li>• Execution of audit / ethical activities</li> </ul>
Legal Reasons for Processing Personal Data	<p>Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:</p> <ul style="list-style-type: none"> <li>• Provided that it is directly related to the establishment or performance of a contract, based on the legal reason that the processing of personal data belonging to the parties to the contract is necessary, for the purposes of execution of finance and accounting works, follow up and execution of legal affairs, execution of contract processes,</li> <li>• Provided that it does not harm the fundamental rights and freedoms of the data subject, based on the legal reason that data processing is mandatory for the legitimate interests of the data controller, for the purposes of execution/supervision of business activities, execution of audit/ethical activities,</li> <li>• Based on the legal reason that the data subject provided their explicit consent, for the purposes of execution/supervision of business activities.</li> </ul>
Personal Data Collection Methods	<ul style="list-style-type: none"> <li>• Electronic Forms</li> <li>• Printed Forms</li> <li>• E-Mail</li> <li>• Invoice</li> <li>• Contract</li> </ul>

Physical Structure Security Information	
Processed Personal Data	<ul style="list-style-type: none"> <li>• CCTV Recordings</li> <li>• Check-in/Exit Date and Time Information</li> </ul>
Purposes of Processing Personal	<ul style="list-style-type: none"> <li>• Providing Physical Space Security</li> <li>• Ensuring the Security of Data Controller Operations</li> </ul>

Data	
Legal Reasons for Processing Personal Data	<p>Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:</p> <ul style="list-style-type: none"> <li>• Provided that it does not harm the fundamental rights and freedoms of the data subject, based on the legal reason that data processing is mandatory for the legitimate interests of the data controller, for the purposes of ensuring the security of physical structures, ensuring the security of data controller operations.</li> </ul>
Personal Data Collection Methods	<ul style="list-style-type: none"> <li>• CCTV Recordings</li> <li>• Record book</li> </ul>

Transaction Security Information	
Processed Personal Data	<ul style="list-style-type: none"> <li>• Device name</li> <li>• Device brand</li> <li>• Device model</li> <li>• Device serial number</li> <li>• IP Address Information</li> <li>• Internet starting and ending time</li> <li>• MAC address</li> <li>• Target IP Address</li> <li>• Port Information</li> </ul>
Purposes of Processing Personal Data	<ul style="list-style-type: none"> <li>• Execution / supervision of business activities</li> <li>• Provision of the safety of movable goods and resources</li> <li>• Execution of activities in accordance with the legislation</li> <li>• Execution of information security processes</li> <li>• Execution of goods / services production and operation processes</li> </ul>
Legal Reasons for Processing Personal Data	<p>Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:</p> <ul style="list-style-type: none"> <li>• Provided that it is directly related to the establishment or performance of a contract, based on the legal reason that the processing of personal data belonging to the parties to the contract is necessary, for the purposes of execution/supervision of business activities, supply of the security of movable goods and resources, execution of activities in accordance with the legislation,</li> <li>• Based on the legal reason that it is expressly provided for by</li> </ul>

	<p>the laws, for the purpose of execution of activities in accordance with the legislation,</p> <ul style="list-style-type: none"> <li>• Carrying out the activities in accordance with the legislation based on the legal reason that it is mandatory for the data controller to fulfill its legal obligation,</li> <li>• Based on the legal reason that the data subject provided their explicit consent, for the purposes of execution/supervision of business activities, execution of goods/services production and operation processes, execution of information security processes.</li> </ul>
<b>Personal Data Collection Methods</b>	<ul style="list-style-type: none"> <li>• Printed Forms</li> <li>• Spreadsheets</li> <li>• Via information systems and electronic devices (data collected without any form- e.g. access logs, etc.)</li> </ul>

<b>Risk Management Information</b>	
<b>Processed Personal Data</b>	<ul style="list-style-type: none"> <li>• Information about the field of activity (Product/Service)</li> <li>• Job list</li> <li>• References</li> <li>• Number of firm employees</li> <li>• Production/Service Capacity</li> <li>• Document status related to product or service</li> <li>• Product or Service Introductory Documents</li> </ul>
<b>Purposes of Processing Personal Data</b>	<ul style="list-style-type: none"> <li>• Execution of goods / services purchase processes</li> <li>• Execution of supply chain management processes</li> </ul>
<b>Legal Reasons for Processing Personal Data</b>	<p>Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:</p> <ul style="list-style-type: none"> <li>• Provided that it does not harm the fundamental rights and freedoms of the data subject, based on the legal reason that data processing is mandatory for the legitimate interests of the data controller, for the purposes of Execution of goods/services purchase processes, execution of supply chain management processes.</li> </ul>
<b>Personal Data Collection Methods</b>	<ul style="list-style-type: none"> <li>• Electronic Forms</li> <li>• Printed Forms</li> </ul>

Finance Information	
Processed Personal Data	<ul style="list-style-type: none"> <li>• Bank account information</li> <li>• Sale price</li> <li>• Invoice information</li> <li>• Debt information</li> </ul>
Purposes of Processing Personal Data	<ul style="list-style-type: none"> <li>• Execution of Finance and Accounting Affairs</li> <li>• Execution/ Supervision of Business Activities</li> <li>• Follow Up and Execution of Legal Affairs</li> <li>• Execution of Contract Processes</li> </ul>
Legal Reasons for Processing Personal Data	<p>Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:</p> <ul style="list-style-type: none"> <li>• Provided that it is directly related to the establishment or performance of a contract, based on the legal reason that the processing of personal data belonging to the parties to the contract is necessary, for the purposes of execution of finance and accounting affairs, follow up and execution of legal affairs, execution of contract processes,</li> <li>• Based on the legal reason that it is mandatory for the data controller to fulfill its legal obligation, for the purposes of execution of finance and accounting affairs,</li> <li>• Based on the legal reason that the data subject provided their explicit consent, for the purposes of execution/ supervision of business activities.</li> </ul>
Personal Data Collection Methods	<ul style="list-style-type: none"> <li>• Electronic Forms</li> <li>• Printed Forms</li> <li>• E-Mail</li> <li>• Contract</li> </ul>

Special Categories of Personal Data
<p>Personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations or trade-unions, data concerning health, sexual life, criminal convictions and security measures, and the biometric and genetic data are deemed to be special categories of personal data.</p> <p>Special categories of personal data require higher protection than other data categories. It is regulated in accordance with the PDPL that additional information should be provided to process such data.</p>

Health Information	
Processed Personal Data	<ul style="list-style-type: none"> <li>● Injury and Disease Information</li> <li>● Limb Loss Information</li> <li>● Alcohol Test Measurement Result</li> <li>● Drug Test Measurement Result</li> </ul>
Purposes of Processing Personal Data	<ul style="list-style-type: none"> <li>● Execution of Occupational Health / Safety Activities</li> <li>● Execution / Supervision of Business Activities</li> <li>● Execution of Activities in Compliance with the Legislation</li> </ul>
Legal Reasons for Processing Personal Data	<p>Your personal data about your health is processed by Nitromak in line with the provisions specified in Article 6 of the PDPL:</p> <ul style="list-style-type: none"> <li>● Execution of occupational health/safety activities, conducting/supervising business activities, conducting activities in accordance with the legislation, based on the legal reason that it is mandatory for the fulfillment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance,</li> <li>● Based on the legal reason that the data subject provided their explicit consent, for the purposes of execution of occupational health / safety activities, execution / supervision of business activities.</li> </ul>
Personal Data Collection Methods	<ul style="list-style-type: none"> <li>● Printed Forms</li> <li>● Electronic Forms</li> </ul>

## 2. To Whom Your Personal Data May Be Transferred and For What Purposes?

Your Personal Data:

- **In Turkey-** may be transferred to **Suppliers** (Information Security Firm, Financial Advisor and Audit Firms, Auditor, Transporter, Lawyer, Customs Consultant, Advertising Agency, Private Security Firm, joint health and safety unit Firm, Travel Agency, Airline / Road Company, Accommodation Company and other) for the purposes of execution/audit of business activities, execution of goods/service procurement processes, follow-up and execution of legal affairs, execution of contract processes, execution of occupational health/safety activities within the scope of services to be provided from suppliers according to the service contract between us; to **Authorized Public Institutions and Organizations** (Notary public, Tax Office, Ministry of Labour and Social Security, Ministry of Environment, Urbanization and Climate Change, Ministry of Agriculture and Forestry, Ministry of Trade, General Directorate of Security, Governorship, Judicial Authorities and other) for the purposes of providing information, execution/supervision of business activities, follow-up and

execution of legal affairs, execution of occupational health/safety activities; to **Real or Private Law Entities** (Banks and other) for the purposes of execution of financial and accounting works, follow-up and execution of legal affairs, execution of contract processes; to **Customers** for the purposes of execution of contract processes, execution/supervision of business activities;

- **In Abroad;** may be transferred to **Incitec Pivot Limited**<sup>1</sup> (“IPL”), of which Nitromak is a subsidiary, for the purposes of execution/ supervision of business activities, execution of information security processes, execution of access authorizations if you give your explicit consent.

Within the framework of the personal data processing conditions in the 5th and 6th articles of the PDPL, by following the rules in the 8th and 9th articles of the PDPL regarding the transfer and by taking the necessary technical and administrative measures.

The servers of several software and systems (ERP, LMS, DMS, ITSM, Fileserver, Active Directory Service and software-based loggings) used by Nitromak for business activities are located at the data center of Incitec Pivot Limited (“IPL”) of which Nitromak is a subsidiary, and Nitromak personal data processed by Nitromak through said software and systems is transferred to IPL for execution/ supervision of business activities.

Since several applications (One Drive, Office 365, Teams, SharePoint, etc.) used by Nitromak are served by Microsoft Corporation, the personal data processed during the use of these applications can be stored using the Microsoft infrastructure located in various parts of Europe. You can find detailed information about the personal data processed during the use of these applications from Microsoft's own privacy policies at the link <https://privacy.microsoft.com/tr-tr/privacystatement>.

### **3. For How Long Your Personal Data Will be Stored?**

Your personal data must be stored according to the time periods set by law or related legislation as a minimum. If there is no time set by law or related legislation, then personal data must be stored for a reasonable period of time determined in connection with the purposes of processing, provided that it is limited and measured.

### **4. What Are Your Rights Regarding Your Personal Data as a Data Subject?**

Regarding your personal data, you have the rights to:

- Learn whether your personal data is processed,
- Request information if your personal data has been processed,
- Learn the purpose of processing personal data and whether your data is used in accordance with that purpose,
- Know the third parties to whom your personal data is transferred, in Turkey or in abroad,
- Request correction of your personal data if it is incomplete or incorrectly processed,

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<sup>1</sup> Incitec Pivot Limited (“IPL”) is a holding company located in Australia, established under Australian law, registered with the Australian Securities and Investment Commission (ASIC), and Nitromak Dnx Kimya Sanayii A.Ş. is one of the companies under the holding umbrella of IPL.



- Request the deletion or destruction of your personal data within the framework of the conditions stipulated in the PDPL legislation,
- When you request the deletion or destruction of your personal data with the correction of incomplete or incorrect data, to request that this situation be notified to the third parties to whom we have transferred your personal data,
- Object to the emergence of a result against the person himself by analysing the processed data exclusively through automated systems,
- If you suffer damage due to unlawful processing of personal data, to request the elimination of this damage.

## 5. How You May Exercise Your Rights as the Data Subject?

You may submit your applications and requests regarding your personal data by completing the Data Subject Application Form on Nitromak's website (<http://www.nitromak.com/basvuru-formu>), and

- By sending it through a notary,
- With a valid identity document, Nitromak's "Via Flat Business Center Beştepeler Mah. Nergis Sokak No: 7/2 Ofis No: 52 Söğütözü Yenimahalle Ankara" by applying in person in writing,
- By sending it to Nitromak's registered electronic mail (KEP) address, [nitromak@hs03.kep.tr](mailto:nitromak@hs03.kep.tr), using a registered electronic mail (KEP) address and secure electronic signature or mobile signature.

Pursuant to the Communiqué on the Procedures and Principles of Application to the Data Controller, the following information must be included in the application of the Relevant Person:

- Name, surname, and signature if the application is written,
- For citizens of the Republic of Turkey- the Turkish id number; for foreigners- the nationality and the passport number or if any, the id number,
- Domicile or workplace address for notification,
- If available, the e-mail address, telephone, and fax number for notification,
- The subject of the request

The Data Subject must clearly and comprehensibly state their request in the application which is to be made to exercise their above-mentioned rights and includes required explanation about the right in subject. Related Information and documents must be attached to the application.

The subject of the request must be related in person to the applicant. However, if the applicant is acting on behalf of someone else, then the applicant must be specifically authorized in this regard and this authority must be documented (power of attorney). In addition, the application must contain identity and address information, and documents confirming identity must be attached to the application.

Requests made by unauthorized third parties on behalf of someone else will not be considered.

**6. How Long Will It Take to Conclude your Request Regarding the Processing of Your Personal Data?**

Your requests regarding your personal data are evaluated and concluded as soon as possible and within 30 days at the latest from the date they reach Nitromak. If your request is accepted or rejected by explaining the reason, our reply will be sent to the address you specified in the application, primarily by postal or e-mail, if possible, in the same manner as your request.