

## CLARIFICATION TEXT REGARDING THE PROCESSING OF PERSONAL DATA FOR PRODUCT OR SERVICE RECIPIENTS (CUSTOMERS)

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

Via Flat İş Merkezi Beştepeler Mah. Nergis Sokak No: 7/2 Ofis No: 52  
Söğütözü Yenimahalle Ankara

As Nitromak Dnx Kimya Sanayii A.Ş. ("**Nitromak**"), the Data Controller; we hereby prepared this Clarification Text to inform you, **our product and service recipients (customers)**, 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>• TR Identity Number</li><li>• Tax Identification Number</li><li>• Tax Office</li><li>• Trade Registry Number</li><li>• Customer Number</li><li>• Customer Code</li><li>• Signature Circular</li><li>• Signature Statement</li><li>• Signature</li><li>• Trade Registry Gazette Information</li><li>• Current Account Code</li><li>• Blasting Project Code</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><li>• Execution of Goods / Services Production and Operation Processes</li><li>• Execution of Customer Relationship Management Processes</li><li>• Execution of Activities for Customer Satisfaction</li><li>• Execution of Good / Service Sales Processes</li><li>• Follow-up of Requests / Complaints</li><li>• Execution of Marketing Processes of Products / Services</li><li>• Organization and Event Management</li><li>• Execution of Communication Activities</li><li>• Execution of Logistics Activities</li></ul>

	<ul style="list-style-type: none"> <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 of financial and accounting affairs, follow-up and execution of legal affairs, execution of contract processes, execution of goods / services production and operation processes, execution of customer relations management processes, execution of activities for customer satisfaction, execution of goods / services sales processes, follow-up of requests / complaints, product / services marketing processes, organization and event management, logistics activities, supply chain 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 financial and accounting affairs, follow-up and execution of legal affairs, execution / supervision of business activities, execution of goods / services sales processes, execution of logistics activities, execution of supply chain 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 follow-up and execution of legal affairs, execution/supervision of business activities, execution of logistics activities, execution of supply chain management processes,</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 marketing processes of products/services, organization and event management.</li> </ul>
<p><b>Personal Data Collection Methods</b></p>	<ul style="list-style-type: none"> <li>• Electronic Forms</li> <li>• Printed Forms</li> <li>• Receipt</li> <li>• Email</li> <li>• Spreadsheet</li> </ul>

	<ul style="list-style-type: none"> <li>● Cheque</li> <li>● Bill</li> <li>● Document Registry</li> <li>● Agreement</li> <li>● Case Files</li> <li>● Files of Executive Proceeding</li> <li>● Website</li> <li>● Business card</li> <li>● Tender Dossier</li> <li>● When Attending a Meeting or Event</li> <li>● Information and Documents Declared by the Data Subject</li> </ul>
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Contact Information	
Processed Personal Data	<ul style="list-style-type: none"> <li>● Phone number</li> <li>● Address</li> <li>● E-mail address</li> <li>● Business Address</li> <li>● Office phone</li> <li>● Fax Number</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> <li>● Execution of Customer Relationship Management Processes</li> <li>● Execution of Activities for Customer Satisfaction</li> <li>● Execution of Good / Service Sales Processes</li> <li>● Execution of Marketing Processes of Products / Services</li> <li>● Organization and Event Management</li> <li>● Execution of Logistics Activities</li> <li>● Execution of Communication 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 executing financial and accounting works, following and executing legal affairs, executing contract processes, executing customer relationship management processes, executing activities for customer satisfaction, executing goods/service sales processes, executing marketing processes of products/services, organization and event</li> </ul>

	<p>management,</p> <ul style="list-style-type: none"> <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 logistics 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>• Printed Forms</li> <li>• Email</li> <li>• Agreement</li> <li>• Business card</li> <li>• Tender Dossier</li> <li>• Information and Documents Declared by the Data Subject</li> <li>• When Attending a Meeting or Event</li> </ul>

<b>Personal Information</b>	
<b>Processed Personal Data</b>	<ul style="list-style-type: none"> <li>• Title</li> <li>• Position Information</li> <li>• Delivered Equipment Information</li> <li>• Location and Facility Information</li> </ul>
<b>Purposes of Processing Personal Data</b>	<ul style="list-style-type: none"> <li>• Execution of Finance and Accounting Affairs</li> <li>• Execution / Supervision of Business Activities</li> <li>• Execution of Goods / Services Production and Operation Processes</li> <li>• Ensuring the Security of Movable Property and Resources</li> <li>• Execution of Good / Service Sales Processes</li> <li>• Execution of Marketing Processes of Products / Services</li> <li>• Organization and Event Management</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 execution of finance and accounting affairs, execution/audit of business activities, execution of goods/service production and operation processes, ensuring the security of movable goods and resources, execution of goods/service sales processes, execution of marketing processes of products/services, organization and event management,</li> </ul>

	<ul style="list-style-type: none"> <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>Printed Forms</li> <li>Email</li> <li>Business card</li> <li>Information and Documents Declared by the Data Subject</li> <li>When Attending a Meeting or Event</li> </ul>

<b>Legal Transaction Information</b>	
<b>Processed Personal Data</b>	<ul style="list-style-type: none"> <li>Legal Status Information</li> <li>Legal Notice</li> <li>Information in Correspondence with Judicial Authorities</li> <li>Information in Correspondence with Administrative Authorities</li> <li>Information in the Case and Enforcement File</li> </ul>
<b>Purposes of Processing Personal Data</b>	<ul style="list-style-type: none"> <li>Execution of Finance and Accounting Affairs</li> <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 execution of finance and accounting affairs, 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 that data processing is mandatory for the establishment, exercise, 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>● Case files</li> <li>● Executive files</li> <li>● Email</li> <li>● Legal Notice</li> </ul>
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<b>Customer Transaction Information</b>	
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<b>Processed Personal Data</b>	<ul style="list-style-type: none"> <li>● Order Information</li> <li>● Invoice/Note/Cheque Information</li> <li>● Shipping Information</li> <li>● Debt Information</li> <li>● Letter of Guarantee Information</li> <li>● Cheque and Bill Information</li> <li>● Deed Mortgage Information</li> <li>● Billing Information</li> <li>● Request Information</li> <li>● Mining Site License Information</li> <li>● Service/Delivery Site Information</li> <li>● Blasting Site Information</li> <li>● Complaint Information</li> <li>● Project Information</li> <li>● Explosive Use Permit</li> <li>● Information in the Tender Dossier</li> <li>● Product information</li> <li>● Warehouse Name</li> <li>● Warehouse Patbis No (Police Department Explosives Registry Online System)</li> <li>● Product Shipment Date</li> <li>● Explosives Carriage Permit</li> <li>● Warehouse Stock Report</li> <li>● Insurance policy</li> <li>● Route Information</li> <li>● Proforma Invoice</li> </ul>
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<b>Purposes of Processing Personal Data</b>	<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> <li>● Execution of Goods / Services Production and Operation Processes</li> <li>● Execution of Customer Relationship Management Processes</li> <li>● Execution of Activities for Customer Satisfaction</li> <li>● Execution of Good / Service Sales Processes</li> </ul>
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	<ul style="list-style-type: none"> <li>● Follow-up of Requests / Complaints</li> <li>● Execution of Logistics 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 of financial and accounting affairs, follow-up and execution of legal affairs, execution of contract processes, execution of goods / services production and operation processes, execution of customer relations management processes, execution of activities for customer satisfaction, execution of goods / services sales processes, follow-up of requests / complaints, business execution/supervision of activities, execution of logistics activities, execution of supply chain 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/audit of business activities, execution of goods/service sales processes, execution of logistics activities, execution of supply chain management processes,</li> <li>● Provided that it does not harm the fundamental rights and freedoms of the data subject, based on the legal subject that data processing is mandatory for the legitimate interests of the data controller, for the purposes of execution/supervision of business activities, execution of logistics activities, execution of supply chain management processes,</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>
<p><b>Personal Data Collection Methods</b></p>	<ul style="list-style-type: none"> <li>● Electronic Forms</li> <li>● Printed Forms</li> <li>● Receipt</li> <li>● Email</li> <li>● Spreadsheet</li> <li>● Check</li> <li>● Bill</li> <li>● Invoice</li> <li>● Document Registry</li> <li>● Letter of guarantee</li> <li>● Agreement</li> </ul>

	<ul style="list-style-type: none"> <li>• Tender Dossier</li> <li>• Information and Documents Declared by the Data Subject</li> </ul>
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Physical Area Security Information	
Processed Personal Data	<ul style="list-style-type: none"> <li>• CCTV Recordings</li> </ul>
Purposes of Processing Personal Data	<ul style="list-style-type: none"> <li>• Ensuring Physical Area Security</li> <li>• Ensuring the Security of Data Controller Operations</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 does not harm the fundamental rights and freedoms of the data subject, based on the legal subject that data processing is mandatory for the legitimate interests of the data controller, for the purposes of ensuring physical area security, ensuring the security of data controller operations, execution of occupational health / safety activities,</li> <li>• Ensuring physical space security, ensuring the security of data controller operations, execution of occupational health / safety activities based on the legal reason that it is mandatory for the data controller to fulfill its legal obligation.</li> </ul>
Personal Data Collection Methods	<ul style="list-style-type: none"> <li>• CCTV Recordings</li> </ul>

Financial Information	
Processed Personal Data	<ul style="list-style-type: none"> <li>• Capital Information</li> <li>• Risk Information</li> <li>• Bank Account Information</li> <li>• Payment Information</li> <li>• Payment Term</li> <li>• Collection Information</li> <li>• Purchase Price</li> <li>• Shareholder Information</li> <li>• Financial Information</li> <li>• Asset Information</li> <li>• Credit Risk Information</li> </ul>



	<ul style="list-style-type: none"> <li>● Investment/Project Information</li> <li>● Tax Board</li> <li>● Collateral Information</li> <li>● Risk Limit</li> </ul>
<b>Purposes of Processing Personal Data</b>	<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 / Supervision of Business Activities</li> <li>● Execution of Good / Service Sales 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 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, Execution of goods/service sales 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 financial and accounting affairs,</li> <li>● Provided that it does not harm the fundamental rights and freedoms of the data subject, based on the legal subject that data processing is mandatory for the legitimate interests of the data controller, for the purposes of execution/supervision of business activities, follow-up and execution of legal 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>
<b>Personal Data Collection Methods</b>	<ul style="list-style-type: none"> <li>● Electronic Forms</li> <li>● Printed Forms</li> <li>● E-Mail</li> <li>● Website</li> <li>● Information and Documents Declared by the Data Subject</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** (Financial Advisor and Audit Firms, Lawyer, Customs Broker, Notary, Insurance Company, Shipping Company, Advertising Agency and other) for the purposes of execution/supervision of business activities, execution of finance and accounting works, follow-up and execution of legal affairs, execution of goods/service procurement processes for services to be procured

from suppliers within the scope of service contract between us; to **Authorized Public Institutions and Organizations** (Courts, Enforcement Offices, Judicial Authorities, Tax Offices, General Directorate of Security and other) for the purposes of execution/supervision of business activities; to **Real or Private Law Entities** (Banks and other) for the purposes of execution of finance and accounting works;

- **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, 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 the world. 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,
- Request the deletion or destruction of your personal data within the framework of the conditions stipulated in the PDPL legislation,

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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.

- 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 Beştepe 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.