

CLARIFICATION TEXT REGARDING THE PROCESSING OF PERSONAL DATA FOR EMPLOYEES OF SUPPLIERS

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 employee**, 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 | |
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| Processed Personal Data | <ul style="list-style-type: none"> • Name surname • Turkish Identity Number • Passport number • Signature • Signature statement • Copy of Driving Driver • Copy of Identity Certificate • Vehicle Plate Information • Vehicle license information • Photograph • Power of attorney • Population Registration Information • SRC number 5 • Social Insurance Registry Number • Father name • Place of birth • Date of birth • Insurance policy • Vehicle model • Vehicle type |

Purposes of Processing Personal Data

- Execution of information security processes
- Execution of access authorizations
- Execution of finance and accounting affairs
- Monitoring and execution of legal affairs
- Execution of contract processes
- Execution of educational activities
- Fulfilling the obligations arising from work contract and legislation for employees
- Execution / supervision of business activities
- Execution of goods / services purchase processes
- Execution of employee satisfaction and commitment processes
- Execution of goods / services production and operation processes
- Execution of marketing processes of product / services
- Execution of advertising / campaign / promotional processes
- Organization and Event Management
- Execution of Communication Activities
- Execution of risk management processes
- Execution of Occupational Health / Safety Activities
- Execution of activities in accordance with the legislation
- Execution of Emergency Management Processes
- Provision of the Safety of Data Officer Operations
- Execution of supply chain management processes
- Execution of audit / ethical activities
- Execution of logistics activities
- Execution of goods / services sales processes

Legal Reasons for Processing Personal Data

Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:

- Provided that it is directly related to the establishment or performance of a contract, for the purposes of execution of information security processes, execution of financial and accounting works, monitoring and execution of legal affairs, execution of contract processes, execution of educational activities, the fulfillment of obligations arising from work contract and legislation for employees, execution of goods/services production and operation processes, execution/supervision of business activities, execution of

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| | <p>marketing processes of products/services, execution of advertising/campaign/promotional processes, organization and activity 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 service purchasing processes, execution of logistics activities, execution of goods/service sales processes, execution/supervision of business activities,</p> <ul style="list-style-type: none"> • 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 follow-up and execution of legal affairs, execution of training activities, 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, execution of supply chain management processes, execution of logistics 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. |
| Personal Data Collection Methods | <ul style="list-style-type: none"> • Email • Printed Forms • Electronic Forms |

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| | <ul style="list-style-type: none"> • Via information systems and electronic devices (data collected without any form – e.g.: access logs, etc.) • Agreement • Power of attorney • Information and documents declared by the Relevant Person • When Attending a Meeting or Event • Record book |
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Contact Information

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| Processed Personal Data | <ul style="list-style-type: none"> • Mobile number • E-mail address • Address • Phone number • Business Address • Office phone • Radio Channel |
| Purposes of Processing Personal Data | <ul style="list-style-type: none"> • Execution of Information Security Processes • Execution of Access Authorizations • Execution of Finance and Accounting Affairs • Follow-up and Execution of Legal Affairs • Execution of Contract Processes • Execution / Supervision of Business Activities • Execution of Employee Satisfaction and Loyalty Processes • Fulfillment of Employment Contract and Legislative Obligations for Employees • Execution of Goods / Services Procurement 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 Compliance with the Legislation • Execution of Emergency Management Processes • Execution of Supply Chain Management Processes • Execution of Logistics Activities |

Legal Reasons for Processing Personal Data

Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:

- 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, execution of access authorizations, execution of goods/service procurement 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 advertisement/campaign/promotion processes, organization and event management, execution of communication activities, execution of occupational health/safety activities, fulfilling obligations arising from employment contracts and legislation for employees, execution of activities in accordance with the legislation, execution of supply chain management processes, execution of logistics activities, execution of goods/service procurement 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 occupational health and safety activities, execution of activities in accordance with the legislation,
- 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,
- 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.

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| Personal Data Collection Methods | <ul style="list-style-type: none"> • Printed Forms • Electronic Forms • Email • Contract • Power of attorney • Information and documents declared by the Data Subject |
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| Location Information | |
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| Processed Personal Data | <ul style="list-style-type: none"> • Vehicle Tracking System Location Information |
| Purposes of Processing Personal Data | <ul style="list-style-type: none"> • Execution / Supervision of Business Activities • Conducting Audit / Ethical Activities • Execution of Logistics Activities |
| 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"> • 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 audit/ethical activities, execution of logistics activities. |
| Personal Data Collection Methods | <ul style="list-style-type: none"> • Electronic Forms • Printed Forms • GPRS |

| Personal Information | |
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| Processed Personal Data | <ul style="list-style-type: none"> • Title • Role • Company • Location and Facility Information • Position • Job Description |

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| | <ul style="list-style-type: none"> • Business Name • Entry-Exit Time • Date of start • Title of the company • Alcohol Measurement Test Result • Accident Date and Time • Accident Information • Information in the Progress Payment File • Social Security Institution Employment Notification • Social Security Institution Workplace Registration • Information in the Personal Protective Equipment Delivery Form • Temporary Assignment Information |
| Purposes of Processing Personal Data | <ul style="list-style-type: none"> • Execution / Supervision of Business Activities • Execution of Information Security Processes • Execution of Finance and Accounting Affairs • Execution of Goods / Services Procurement Processes • Execution of Goods / Services Production and Operation Processes • Execution of Access Authorizations • Conducting Educational Activities • Fulfillment of Employment Contract and Legislative Obligations for Employees • Execution of Marketing Processes of Products / Services • Execution of Advertising / Campaign / Promotion Processes • Organization and Event Management • Execution of Risk Management Processes • Execution of Occupational Health / Safety Activities • Execution of Activities in accordance with the Legislation • Execution of Emergency Management Processes • Ensuring the Security of Data Controller Operations • Execution of Audit / Ethical Activities • Execution of Supply Chain Management Processes |
| 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"> • 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 |

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| | <p>parties to the contract is necessary, for the purposes of execution/audit of business activities, execution of information security processes, execution of finance and accounting affairs, execution of goods/service procurement processes, execution of training activities, fulfillment of obligations arising from employment contracts and legislation for employees, execution of production and operation processes of goods/services, execution of marketing processes of product/ services, execution of advertising/ campaign / promotion processes, organization and event management, execution of occupational health/safety activities, execution of supply chain management processes, execution of risk management processes,</p> <ul style="list-style-type: none"> • 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/supervision of business activities, execution of activities in accordance with the legislation, ensuring the security of data controller operations, • 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. |
| <p>Personal Data Collection Methods</p> | <ul style="list-style-type: none"> • Printed Forms • Electronic Forms • Email • Via information systems and electronic devices (data collected without any form – e.g.: access logs, etc.) • Information and documents declared by the Data Subject |

Professional Experience Information

Processed Personal Data

- Certificate information
- Professional Certificates
- Diploma Information
- Occupational Medicine Certificate Date and Number
- Vocational Education Documents
- SRC 5 Certificate
- Class 1 Certificate
- Transporter Security Certificate

Purposes of Processing Personal Data

- Execution of Occupational Health / Safety Activities
- Fulfillment of Employment Contract and Legislative Obligations for Employees
- Execution of Risk Management Processes
- Execution of Activities in Compliance with the Legislation
- Execution / Supervision of Business Activities
- Execution of Supply Chain Management Processes
- Execution of Logistics Activities
- Execution of Goods / Services Procurement Processes

Legal Reasons for Processing Personal Data

Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:

- 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 of risk management processes, execution/supervision of business activities, execution of supply chain management processes, execution of logistics activities, execution of goods/service procurement processes,
- 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,

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| | <ul style="list-style-type: none"> Based on the legal reason that it is expressly provided for by the laws, for the purposes of execution of occupational health / safety activities, execution of activities in accordance with the legislation. |
| Personal Data Collection Methods | <ul style="list-style-type: none"> Electronic Forms Printed Forms |

Legal Transaction Information

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| Processed Personal Data | <ul style="list-style-type: none"> Letter of Dismissal Letter of Commitment |
| Purposes of Processing Personal Data | <ul style="list-style-type: none"> Follow-up and Execution of Legal Affairs |
| 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"> 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. |
| Personal Data Collection Methods | <ul style="list-style-type: none"> Power of Attorney Letter of Commitment |

Customer Transaction Information

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| Processed Personal Data | <ul style="list-style-type: none"> Shipping Information Explosives Carriage Permit (Road Permit) |
| Purposes of Processing Personal Data | <ul style="list-style-type: none"> Execution / Supervision of Business Activities Execution of Audit / Ethics Activities |

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| 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"> • 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 audit/ethical activities, • 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, execution of supply chain management processes, execution of logistics activities, • 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 supply chain management processes, execution of logistics activities. |
| Personal Data Collection Methods | <ul style="list-style-type: none"> • Electronic Forms • Printed Forms |

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

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| | <p>purposes of ensuring the security of physical structures, ensuring the security of data controller operations, execution of occupational health / safety activities,</p> <ul style="list-style-type: none"> Based on the legal reason that it is mandatory for the data controller to fulfill its legal obligation, for the purposes of ensuring the security of physical structures, ensuring the security of data controller operations, execution of occupational. |
| Personal Data Collection Methods | <ul style="list-style-type: none"> CCTV Recordings Record book Information declared by the Data Subject |

Audio and Visual Recording Information

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| Processed Personal Data | <ul style="list-style-type: none"> Photo |
| Purposes of Processing Personal Data | <ul style="list-style-type: none"> Execution of occupational health/safety activities |
| 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"> 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, Based on the legal reason that it is mandatory for the data controller to fulfill its legal obligation, for the purposes of execution of occupational health/safety activities. |
| Personal Data Collection Methods | <ul style="list-style-type: none"> Photograph |

Special Categories of Personal Data

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.

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.

Health Information

Processed Personal Data

- Injury and Disease Information
- Limb Loss Information
- Alcohol Test Measurement Result
- Drug Test Measurement Result
- Health Report
- Periodic Inspection Report

Purposes of Processing Personal Data

- Execution of Occupational Health / Safety Activities
- Execution / Supervision of Business Activities
- Execution of Activities in Compliance with the Legislation
- Execution of Supply Chain Management Processes

Legal Reasons for Processing Personal Data

Your personal data about your health is processed by Nitromak in line with the provisions specified in Article 6 of the PDPL:

- Carrying out occupational health/safety activities, carrying out activities in accordance with the legislation, carrying out/supervising business activities, carrying out supply chain management processes 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.

Personal Data Collection Methods

- Printed Forms
- Electronic Forms

| Ceza Mahkumiyeti ve Güvenlik Tedbiri Bilgileri | |
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| İşlenen Kişisel Veriler | <ul style="list-style-type: none"> • Criminal Record Information |
| Kişisel Verilerin İşlenme Amaçları | <ul style="list-style-type: none"> • Execution of Supply Chain Management Processes • Execution of Activities in Compliance with the Legislation • Ensuring the Security of Data Controller Operations |
| Kişisel Verilerin İşlenmesinin Hukuki Sebepleri | <p>Your data on Criminal Convictions and Security Measures are processed by Nitromak for purposes of</p> <ul style="list-style-type: none"> • carrying out supply chain management processes, execution of activities in accordance with the legislation, and ensuring the security of data controller operations 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, as specified in paragraph 3 of Article 6 of the PDPL. |
| Kişisel Verileri Toplama Yöntemleri | <ul style="list-style-type: none"> • Printed forms • Electronic forms |

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

Your Personal Data:

- **In Turkey-** may be transferred to **Suppliers** 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** 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** 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 **Real or Private Law Entities**, for the purposes of execution/ supervision of business activities, execution of information security processes, execution of access authorizations.

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.

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,
- 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, 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.