

LPPD (Law on the Protection of Personal Data)

The confidentiality and security of your personal data is of great importance for Koroplast Temizlik Ambalaj Ürünleri San. Ve Dış Tic. A.Ş (“**Koroplast A.Ş Organizations**”). Koroplast A.Ş Organizations aim to fulfill the requirements for compliance with the PPD Law and to establish a data protection and processing policy in international standards with the ongoing efforts that started long before the enforcement of the Personal Data Protection Law No. 6698 (“**PPD Law**”).

The principles adopted by Koroplast A.Ş. Organizations in the protection and processing of personal data and taken into account in practice are set out in the Koroplast A.Ş. Organizations Personal Data Protection Policy (“**Policy**”). The Policy also provides information on the purposes for which Koroplast A.Ş. Organizations process personal data, the method of collecting personal data, its legal purpose, to whom and for what purposes the data can be transferred and the rights of the data owners.

Within the scope of the PPD Law, Koroplast A.Ş. Organization is the “data controller” in its own business and operations, and the information and principles in the Policy apply to Koroplast A.Ş. Koroplast A.Ş. has approved and accepted this Policy to be valid as of October 07, 2016.

1) SECTION: GENERAL INFORMATION

Koroplast A.Ş. processes your personal data within the limits stipulated by the legislation as follows.

Method of Collection of Personal Data:

Your personal data may be processed and transferred in accordance with the basic principles stipulated by LPPD, within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of LPPD, for the purposes specified in this policy and by taking information security measures, provided that it is not used outside the scope.

Your personal data is collected by our Company through different channels and based on different legal reasons in order to carry out our commercial activities and to enable you to benefit from our services. The personal data processed may vary according to the type and nature of our products and services. We may collect your personal data verbally, in writing or electronically by automatic or non-automatic methods, through our offices, website, social media, and other means with which we have business relations.

Your personal data that you have shared with us with your own will and volition may be processed as long as you benefit from our products and services and may be updated when necessary to ensure the accuracy and currency of your data. In addition, your personal data may also be processed when you physically visit Koroplast A.Ş. office buildings, branches, or visit websites and/or other social and digital media or participate in activities such as events and organizations organized by Koroplast A.Ş. in order to benefit from our products and services.

Purposes and Procedure for Processing Personal Data:

Your personal data (such as name, surname, date of birth, mobile phone number, e-mail, gender, address, profession, education, marital status, identity information, social media, billing information) that you have shared with us with your own will and volition are processed in order to provide you with better service. In addition, within the framework of our legal obligations arising from the relevant legislation, especially the Law No. 5651 on the Regulation of Publications on the Internet and Combating Crimes Committed through These Publications and related legislation, the Law No. 6563 on the Regulation of Electronic Commerce and related legislation, the Turkish Penal Code No. 5237 and the Law No. 6698 on the Protection of Personal Data; Your personal data is also processed in order to ensure that the said purposes and legal obligations can be fulfilled. As it has been until today, your personal data will be processed and stored by taking information security measures, provided that they are not used outside the purposes and scope specified in this Personal Data Protection Policy, based on your explicit consent, without prejudice to the exceptions set out in Articles 5 and 6 of the Personal Data Protection Law.

The basis of the personal data processing activity may be only one of the following conditions, or more than one of these conditions may be the basis of the same personal data processing activity.

Explicit Consent of the Personal Data Owner

One of the conditions for processing personal data is the explicit consent of the data subject. The explicit consent of the personal data owner must be related to a specific subject, based on information and free will. The data shall be processed within the scope of the explicit consent of the data owner and for the purposes specified in the explicit consent. As a rule, there is no need to obtain the explicit consent of the data owner in the presence of the other conditions below.

Explicitly Stipulated in Laws

The personal data of the data owner shall be processed in accordance with the law, if expressly stipulated in the law. In cases where data processing is permitted by law, data is processed limited to the reasons and data categories specified in the relevant law.

Failure to Obtain Explicit Consent of the Data Owner Due to Actual Impossibility

The personal data of the data owner may be processed if it is mandatory to process the personal data of the person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be recognized as valid, in order to protect the life or physical integrity of himself/herself or another person.

Direct Relevance to the Conclusion or Performance of the Contract

Provided that it is directly related to the conclusion or performance of a contract, personal data may be processed if it is necessary to process personal data of the parties to the contract (provided that the person whose data will be processed based on the conclusion or performance of the contract is one of the parties to the contract).

Fulfillment of Legal Obligation

Personal data of the data owner may be processed if data processing is mandatory for Koroplast A.Ş. Organizations to fulfill their legal obligations.

Publicization of Personal Data by the Personal Data Owner

In the event that the personal data of the data owner is made public by him/her, the relevant personal data may be processed limited to the purpose of publicization.

Data Processing is Mandatory for the Establishment or Protection of a Right

If data processing is mandatory for the establishment, exercise or protection of a right, the personal data of the data owner may be processed.

Data Processing is Mandatory Due to Legitimate Interests

Provided that it does not harm the fundamental rights and freedoms of the personal data owner, the personal data of the data owner may be processed if data processing is mandatory for the legitimate interests of Koroplast A.Ş. Organizations. If the processed data is personal data of special nature as defined in the PPD Law, if there is no explicit consent of the personal data owner, personal data can only be processed in the following cases, provided that adequate measures to be determined by the PPD Board are taken:

Sensitive personal data other than the health and sexual life of the personal data owner,

In cases stipulated by law, personal data of special nature relating to the health and sexual life of the personal data owner may only be processed by persons or authorized institutions and organizations under the obligation of confidentiality for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

Personal Data Security

In accordance with Article 12 of the PPD Law, Koroplast A.Ş. takes appropriate measures to prevent unlawful processing of personal data, to prevent unlawful access to such data, to ensure their preservation and to prevent unlawful processing of personal data by third parties.

Transfer of Personal Data

Your personal data may be transferred to Koroplast A.Ş.'s shareholders, legally authorized public institutions and organizations, our suppliers and business partners, service recipients or other third parties and/or abroad within the framework of the personal data processing conditions and purposes specified in Article 8 and Article 9 of the PPD Law in order to fulfill the purposes specified in this Policy.

RIGHTS OF THE PERSONAL DATA OWNER LISTED IN ARTICLE 11 OF THE PPD LAW

In accordance with Article 11 of the PPD Law, you have every right to:

- To learn whether personal data is being processed,
- Request information if their personal data has been processed,
- To learn the purpose of processing personal data and whether they are used for their intended purpose,
- To know the third parties to whom personal data are transferred domestically or abroad,
- To request correction of personal data in case of incomplete or incorrect processing,
- To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- To request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear, although it has been processed in accordance with the provisions of the PPD Law and other relevant laws, and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- To object to the emergence of a result to the detriment of the person himself/herself by analyzing the processed data exclusively through automated systems,
- In case of damage due to unlawful processing of personal data, you have the right to demand compensation for the damage.

It is important that the information/data you share is accurate and kept up to date in order to exercise the rights on the data in terms of the PPD Law and other relevant legislation, and the responsibilities arising from providing false information are entirely yours.

You can exercise your rights in accordance with Article 11 of Law No. 6698 as stated above by contacting etik@koroplast.com.

2) SECTION: BASIC PRINCIPLES

Koroplast A.Ş. meets the general principles and conditions set forth in the legislation regarding the protection and processing of personal data and acts in accordance with the principles listed below in order to ensure that personal data is processed in accordance with the Constitution and PPD Law.

Compliance of Personal Data Processing Activities with the Law and the Rule of Honesty

- Pursuant to Article 4 of the PPD Law, Koroplast A.Ş. processes personal data in accordance with the law and good faith, adopts the principle of “transparency” towards data owners and informs personal data owners. The information is based on openness and honesty, clear information is given about the purpose of use of the personal data collected and the data is processed within this framework. The use of personal data without any legal justification in a way that may have a negative impact on the data owner is avoided.

Ensuring that Personal Data is Accurate and Updated When Necessary

- Koroplast A.Ş. ensures that the personal data it processes is accurate and up-to-date.

Processing of Personal Data for Specific, Explicit and Legitimate Purposes

- Koroplast A.Ş. collects and processes personal data for legitimate and lawful reasons. Koroplast A.Ş. processes personal data in connection with the activities they carry out, within a reasonable framework and to the extent necessary.

Being relevant, limited and proportionate to the purpose for which they are processed

- Koroplast A.Ş. avoids processing personal data that are not relevant or not needed for the purpose of processing. Within this framework, it is essential to minimize the data processing activity.

Preservation for the Period Stipulated in the Relevant Legislation or Required for the Purpose for which they are Processed

- In accordance with Article 138 of the Turkish Penal Code and Article 4 and Article 7 of the PPD Law, Koroplast A.Ş. retains the personal data they process only for the period stipulated in the relevant legislation and laws or required by the purpose of personal data processing. In this context, it is first determined whether a certain period of time is stipulated in the relevant legislation for the storage of personal data owner to processing. If a legal period is determined, this period is complied with. If the legal period is not determined, the period required for the realization of the purpose of processing is determined and the personal data is stored for a limited period of time. When the period expires, personal data shall be deleted, destroyed or anonymized, unless there is a legal reason requiring the data to be stored for a longer period of time.

3) SECTION: ENFORCEMENT AND IMPLEMENTATION

This Policy entered into force on October 07, 2016. In the event that all or certain articles of the Policy are updated, the updates enter into force on the date of their publication.

Definitions:

Explicit Consent:	Consent on a specific subject, based on information and expressed with free will.
Anonymization:	Changing personal data in such a way that it loses its personal data nature and this situation cannot be reversed.
Affiliated Company:	Means the company directly or indirectly controlled by Koroplast A.Ş.
Personal Data Owner:	The natural person whose personal data is processed. For example; Customers, suppliers, visitors, employees and employee candidates.
Personal Data:	Any information relating to an identified or identifiable natural person. Therefore, the processing of information on legal persons is not covered by the Law. For example; name-surname, TR ID, e-mail, address, date of birth, credit card number, bank account number, etc.
Sensitive Personal Data:	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data are data of private nature.
Processing of Personal Data:	Any processing performed on personal data such as obtaining, recording, storing, retaining, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or by non-automatic means provided that it is part of any data recording system.

Data Controller:	A data controller is the person who determines the purposes and means of processing personal data and manages the place where the data is systematically kept (data recording system). For example, each legal entity.
Data Processor:	A natural or legal person who processes personal data on behalf of the data controller based on the authorization granted by the data controller.

Data Controller: Koroplast Temizlik Ambalaj Ürünleri San. Ve Dış Tic. A.Ş (hereinafter referred to as Koroplast), Atatürk Mah. Orhan Veli Cad. Koroza Apt No:12/1 Kırac, Esenyurt / Istanbul

As **Koroplast**, we respect the personal data we manage while continuing our activities and we show maximum sensitivity to the security of personal data. We care about the protection of fundamental rights and freedoms, especially the privacy of private life, in the processing of your personal data, and with this clarification text, in accordance with the provisions of the Personal Data Protection Law No. 6698 (“LPPD”), we inform you about the ways your personal data are collected, the purposes of processing, legal reasons and our mutual rights and obligations. Your personal data may be obtained, recorded, stored, preserved, disclosed, transferred to third parties or abroad to the extent permitted by the legislation or processed in other ways by KOROPLAST TEMİZLİK AMBALAJ ÜRÜNLERİ SAN. VE DIŞ TİC. A.Ş (“**Koroplast**”) as the **Data Controller**, in accordance with the provisions of **LPPD** and within the framework described below.

Collection, Processing and Processing Purposes of Personal Data:

Your collected personal data may be processed by KOROPLAST in accordance with the basic principles stipulated by LPPD and the personal data processing conditions and purposes specified in Articles 5 and 6 of the law:

Although your personal data may vary depending on the products and services provided by our Company and its commercial activities, for the purposes listed in more detail below; It may be collected verbally, in writing or electronically by automatic or non-automatic methods, our Company's units and offices, KOROPLAST TEMİZLİK AMBALAJ ÜRÜNLERİ SAN. VE DIŞ TİC. A.Ş., especially the website, social media channels, mobile applications, training, seminars or organizations organized by KOROPLAST and similar means. Our Company carries out surveillance activities with security cameras in workplaces, offices, facilities and educational institutions for physical security purposes, and records are taken at the entrance and exit of our visitors. The historical connection information of those who benefit from our Company's internet services is stored in accordance with the requirements of the law. Your personal data may be updated and processed as long as you benefit from the products and services offered by our Company and our affiliated companies.

Your personal data is processed for the following purposes:

Carrying out the necessary work by the relevant units of KOROPLAST in order to fulfill the commercial activities and services carried out by KOROPLAST in accordance with the legislation and the Company's Internal Policies and Procedures and carrying out activities in this direction; Determination, planning and implementation of KOROPLAST's commercial policies;

Ensuring the legal and commercial security of real or legal persons with whom KOROPLAST has a business relationship (administrative operations for communication carried out by KOROPLAST, ensuring the physical security and supervision of KOROPLAST's office workplace facility and all similar locations, Evaluating KOROPLAST and its customers, complaint management processes regarding products etc., reputation research processes, event management, legal compliance process, internal and external audits, financial affairs, etc.),

Designing and executing all kinds of human resources activities of KOROPLAST and supporting these activities; Protecting the commercial reputation of KOROPLAST and the trust it creates.

You can access more detailed information about the purposes of processing your personal data by KOROPLAST by accessing the 'Koroplast Personal Data Protection and Processing Policy' on the official website www.koroplast.com.

Transfer of Processed Personal Data:

Your collected personal data may be transferred to legally authorized public and/or private legal entities, our affiliated companies including Koroplast Temizlik Ambalaj Ürünleri San. Ve Dış Tic. A.Ş., our direct / indirect domestic / foreign affiliates, consultants, auditors and / or service providers within the framework of the relevant legal provisions within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the Law to supervisory and regulatory authorities, relevant public institutions, professional organizations and similar organizations and persons or organizations permitted by the provisions of the Turkish Commercial Code and other relevant legislation, To fulfill the commercial activities carried out by KOROPLAST in accordance with the legislation and Company Internal Policies and Procedures, To carry out the necessary work by the relevant units of KOROPLAST and to carry out activities in this direction, For the determination, planning and implementation of KOROPLAST's commercial policies, To ensure the legal and commercial security of KOROPLAST and real or legal persons who have a business relationship with KOROPLAST, (For administrative operations for communications carried out by KOROPLAST, To ensure the physical security and supervision of KOROPLAST's offices, workplaces, facilities and all similar locations, KOROPLAST's customer evaluation, product etc. complaint management processes, reputation research processes, event management, legal compliance process, internal and external audits, financial affairs, etc. To design and execute all kinds of human resources activities of KOROPLAST and to support these activities, in order to protect the commercial reputation of KOROPLAST and the trust it has built

Method and Legal Grounds for Collecting Personal Data:

Your personal data is collected in all kinds of verbal, written or electronic media in order to provide the products, trainings and services we offer in line with the above-mentioned purposes within the legal framework determined and in this context, in order for our Company to fulfill its contractual and legal obligations completely and accurately. Your personal data collected for this legal reason can be processed and transferred within the framework of the personal data processing conditions and purposes specified in Articles 5 and 6 of LPPD and for the purposes specified in this clarification text.

Circumstances Requiring Your Explicit Consent Regarding Personal and/or Sensitive Personal Data:

Pursuant to Article 5, paragraph 2 of the LPPD, KOROPLAST has the right to process personal data (personal data other than health and sexual life) without obtaining explicit consent in the following cases, if expressly provided for in the law, it is necessary for the protection of the life or physical integrity of the person or another person who is unable to give consent due to actual impossibility or whose consent is not legally valid, if it is necessary to process personal data of the parties to the contract, provided that it is directly related to the conclusion or performance of a contract, if it is mandatory for the data controller to fulfill its legal obligation, has been made public by the person concerned, if data processing is mandatory for the establishment, exercise or protection of a right, if data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data owner

Except for the exceptions specified in the legislation and listed above, all your personal data, including your sensitive personal data, cannot be processed without your explicit consent. Before your explicit consent is obtained, you must be informed in detail about the reason for the processing of your data.

Data Security:

We attach importance to protecting the confidentiality and security of all personal data you provide to us. Accordingly, we take all necessary technical and administrative security measures to protect your personal data against the risks of unauthorized access, damage, loss or disclosure.

The Rights of the Personal Data Owner Enumerated in Article 11 of the LPPD:

- Learn whether personal data is being processed,
- Request information if their personal data has been processed,
- To learn the purpose of processing personal data and whether they are used for their intended purpose,
- To know the third parties to whom personal data are transferred domestically or abroad, to request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- To request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear, although it has been processed in accordance with the provisions of LPPD and other relevant laws, and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- To object to the emergence of a result to the detriment of the person himself/herself by analyzing the processed data exclusively through automated systems,
- To demand the compensation of the damage in case of damage due to unlawful processing of personal data,

You have the above rights. You can send us your request to exercise these rights in writing or in accordance with this method if a separate method is determined by the Personal Data Protection Board.

You can send your written request to Atatürk Mah. Orhan Veli Cad. No:12 Kır a Esenyurt Istanbul address in person with documents identifying your identity, or you can send it to korozo.ik@korozo.hs03.kep.tr with secure electronic signature.

In the application containing your explanations regarding the right you have as a personal data owner and that you will make in order to exercise your rights mentioned above and that you request to exercise; the matter you request must be clear and understandable, the subject you request must be related to you personally or if you are acting on behalf of someone else, you must be specifically authorized in this regard and document your authority, the application must contain identity and address information and documents certifying your identity must be attached to the application.