

## **Introduction**

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As Sanem Plastik, we give importance about the protection of the personal data of the persons who are processed their data by our company or contacting with us as a representative of a company.

The Personal Data Protection Policy (“Policy”), which is engaged Sanem Plastik as a data supervisor liability, is based on the processes and principles of collecting, using, sharing, storing, processing, deleting, destroying or anonymizing natural persons data and the legal and administrative precautions (assignment and authorization) that should be taken about this process and explain our policies about technical precautions (information security technologies and physical safety).

## **Purpose**

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Taking into account the administrative and technical regulations determined by the Law on Protection of Personal Data No. 6698 (“KVKK”) (Equivalent to GDPR in EU) in our country and the verdicts published by the Personal Data Protection Board (“Board”), it is our main obligation and desire to protect the natural persons, their privacy, while processing of personal data.

Our purpose is to raise awareness and understanding of the importance, sensitivity and protecting of personal data.

This Policy includes implementations and conditions in Sanem Plastik to be compatible with the regulations and liabilities issued by the relevant authorities about protections and process of personal data; determination of the strategies, in-house supervisions and precautions, operations, rules and liabilities assessing the incidents that may take place in the course of events with a risk-based approach.

## **Scope**

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The scope of this Policy constitutes the activities for the protection and processing, obtaining a part of or all of the personal data by using an automatic, semi-automatic or non-automatic data recorder, saving, storing, preserving, changing, rearranging, publishing, transferring, categorizing, preventing the utilization, destruction of the personal data regarding the privacy and confidentiality of personal data belonging to Sanem Plastik’s employees (current and former), employee candidates, subcontractors, our active and potential customers, suppliers, business partners, affiliates, service providers, visitors and other third parties.

Both legal and natural persons as Data Processors who have access authorization in any way with any purpose during the execution of these processes are within the scope of the Policy.

## **Our Company**

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Information of the company which will be identified as Sanem Plastik is listed below:

Sanem Plastik: SANEM PLASTIK SANAYI VE TICARET A.Ş. (MERSIS No: 0-7430-8418-57000001)

Our addresses:

Sanem 1/HQ: Yazıbaşı Mah. Karabağ Sok. No:17 Yazıbaşı/Torbalı 35875 İzmir

Sanem 2: Yazıbaşı Mah. Gümaksan Sok.No:1/1 Torbalı 35875 İzmir

## **Definitions**

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Some definitions mentioned in the Policy;

Explicit Consent: Freely given, specific and informed consent

Constitution: The Constitution of the Republic of Turkey (TR Law No: 2709)

Anonymization: Rendering personal data impossible to link with an identified or identifiable natural person, even though matching them with other data

Data Subject: Natural person whose personal data is processed

Personal Data: Any information relating to an identified or identifiable natural person

Processing of Personal Data: Any operation performed upon personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable, classification or preventing the use thereof, fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means

Board: The Personal Data Protection Board

KVKK: Personal Data Protection Law No. 6698 and applicable legislations

Policy: The Personal Data Protection Policy

Data Processor: The natural or legal person who processes personal data on behalf of the data controller upon its authorization (KVKK Art.3-(1)-ğ)

Data Registration System: The system where personal data are processed and -structured according to certain criteria Data Controller: The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data registration system (KVKK Art.3-(1)-ı)

## **General Principles**

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### **Legitimacy**

This Policy considers the Constitution and KVKK, all relevant legislation and the implementations required by working conditions. Therefore, it should be known that the basis is the legislation.

### **Reviews**

The Policy, other procedures and implementations are being synchronized with the legislation by reviewing the changes in the relevant legislation after the publishing date. Reviews are made regularly, at least once a year, with or without any change.

### **Legal Compliance**

The protection and confidentiality of the personal data is a legal right given by the Constitution and regulated by law. Not knowing is not an excuse. Therefore, it is mandatory to comply with it for everyone without exception. In the contrary case, it should be known that penal actions required by the relevant legislation and contracts will be applied in cases of violation.

Fundamental legal and ethical principles of Sanem Plastik is regulated by KVKK (Art.4).

Personal data can only be processed in accordance with KVKK, procedures and principles mentioned in other laws.

The following principles below are complied with in the processing of personal data:

- a. Lawfulness and conformity with rules of bona fides
- b. Accuracy and being up to date, where necessary
- c. Being processed for specific, explicit and legitimate reasons
- d. Being relevant with, limited to and proportionate to the purposes for which they are processed
- e. Being retained for the period of time stipulated by relevant legislation or the purpose for which they are processed.

Our company complies with these principles.

### **Obligation to Inform**

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The Policy, with regards to KVKK Article 10, is prepared to inform about protection of personal data and legal rights as a part of obligation to inform.

It must inform about these matters below in this Policy and information texts of other companies and data subjects;

- a. An Identity of the Data Controller and his/her representative if any,
- b. For what purpose the personal data will be processed,
- c. To whom and for what purpose the processed personal data can be transferred,
- d. The procedure and the legal reasons for the personal data collection,
- e. Other rights mentioned in the Art.11

These matters are clearly stated.

### **Processed Personal Data**

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With regards to law, personal data which belongs to a natural person who is identified or identifiable, are processed partly or completely, automatically or non-automatically as a part of the registration system is categorized as below:

<b>Data Categories</b>	<b>Explanation</b>
Identity	Name, surname, parents' name, mother's maiden name, date of birth, place of birth, marital status, id card serial number, identity number etc.
Communication	Address, address number, e-mail address, contact address, registered electronic post address (KEP), telephone number etc.
Location	Vehicle tracking system or the place information during a car accident etc.
Personnel	Payroll, discipline interrogation, state of employment, declaration of property, CV information, performance evaluation reports etc.

Legal Transaction	Correspondence with judicial authorities, court file documents etc.
Customer Operation	Request and order information, bill, note and bill of exchange, payment receipt etc.
Marketing	Shopping history information, survey, cookie records, information obtained by campaign work etc.
Physical Space Security	Employee's and his/her visitor's entry and exit information, camera recordings etc.
Process Security	IP address, website entry-exit information, password information etc.
Occupational Experience	Diploma information, courses, vocational training information, certificates, transcript etc.
Visual and Auditory Recordings	Audio-visual recordings such as photographs etc.
Philosophical Beliefs, Religion, Sectarian and Other Beliefs	Religious information which was written on the old ID cards etc.
Clothing	Information about clothing such as size etc.
Health Information	Disability information, blood type, personal health information, replacements or devices etc.
Criminal Conviction and Security Precautions	Information on criminal convictions in criminal records and traffic fines, such as data on security measures etc.
Biometric Data	Information used for control while entering critical spaces.

**Groups Whose Personal Data are Processed**

The personal data of which Sanem Plastik is the Data Controller is evaluated in the following groups and the classification is made according to these groups.

<b>Data Subject Group</b>	<b>Processed Personal Data</b>
Employee Candidate	Natural person who transmitted his/her personal data at any time using any communication method

Employee	Current employees who have present working contracts and their relatives.  Former employees who used to have working contracts and their relatives.
Shareholder/Partner	Natural persons who have a partnership with Sanem Plastik or have shares in Sanem Plastik in any way or natural persons who have representatives
Intern	Natural persons, who are of full age or underage, in student status and working within the scope of short-term internship through an educational institution
Supplier's Employee	Natural persons who are employees of the real or legal persons from whom we purchase goods and services
Supplier Representative	Natural persons who are authorized by the real and legal persons from whom we purchase goods and services
Other-Customer Representative	Natural persons who are authorized by the real and legal persons to whom we sell goods
Parent/Guardian/Representative	Natural persons who are parents/guardians of real or legal persons or who represent them
Visitor	Natural persons who have come to our company to visit or who make transactions using our company's website

**Related Personal Data Categories of the Person Groups Whose Data Are Processed**

The data categories of the persons whose data are processed are as in the table below:

<b>Data Subject Group</b>	<b>Processed Personal Data</b>
Employee Candidate	Identity, Communication, Personnell File, Physical Space Safety, Occupational Experience, Health Information
Employee	Identity, Communication, Location, Personnel File, Legal Transaction, Physical Space Security, Transaction Security, Finance, Professional Experience, Audio-Visual Records, Philosophical Belief, Religion, Religious Sect and Other Beliefs, Clothing, Health Information, Criminal Conviction and Security Measures, Biometric

	Data
Shareholder/Partner	Identity, Communication, Finance, Physical Space Security, Transaction Security, Audio-Visual Records, Criminal Conviction and Security Measures
Intern	Identity, Communication, Personnel File, Physical Space Security, Transaction Security, Finance, Professional Experience, Audio-Visual Records, Clothing, Criminal Conviction and Security Measures, Health Information
Supplier's Employee	Identity, Communication, Personnel File, Physical Space Safety, Transaction Security, Professional Experience, Audio-Visual Records, Health Information
Supplier's Representative	Identity, Communication, Legal Transaction
Other-Customer Representative	Identity, Communication, Physical Space Safety, Transaction Security, Audio-Visual Records, Customer Transaction, Marketing
Visitor	Identity, Physical Space Safety, Audio-Visual Records, Transaction Security

### Terms And Purposes Of Processing Personal Data

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The purposes of collecting and processing personal data, legal and legislative requirements are processed in the Information Texts prepared for the data subject groups.

- Employee and Employee Candidate Information Text
- Visitor and Supplier Information Text
- Customer Information Text

All personal data is processed as required by "KVKK" (No. 6698), Income Tax Law (No. 193), Tax Procedure Law (No. 213), Code of Obligations (6098), Enforcement and Bankruptcy Law (No. 2004), Turkish Commercial Code (No. 6102), Labor Law (No. 4857), Act on Occupational Health and Safety (No. 6331), Social Security and General Health Insurance Law (No. 5510), BES and Investment System Law (No. 4632), Vocational Education Law (3308), Unemployment Insurance Law (No. 4447), Stamp Duty Law (No. 488), Fees Law (No. 492), Institutions Tax Law (No. 5520), Electronic Communications Law (No. 5809), Intellectual Property Rights Law (No. 5846), Electronic Signature Law (No. 5070), Law on Regulation of Publications Made on the Internet and Fighting Against Crimes Committed Through These Publications (No. 5651) and other legislation (laws, regulations, circulars, communiqués).

### Obligations Regarding Data Security

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**General Application**

Institutional policies on access, information security, use, storage and destruction have been prepared and started to be implemented.

Personal data security policies and procedures have been determined.

Personal data security issues are reported quickly.

Personal data security is monitored.

Personal data are minimized as far as possible.

Present risks and threats have been identified.

The protocols and procedures for special categories of personal data security have been determined and implemented.

**Personal Data Protection By Employees**

There are disciplinary regulations that include data security provisions for employees.

Training and awareness activities on data security are carried out periodically for employees.

Authorization matrix has been prepared for employees.

The authorizations of employees who have a change in duty or quit their job in this field are removed.

Confidentiality undertakings have been signed.

**Physical Protection Measures**

Extra security measures are taken for personal data transferred by paper and the relevant document is sent in confidential document format.

Necessary security measures are taken regarding entry and exit to physical environments including personal data.

The security of physical environments including personal data against external risks (fire, flood, etc.) is ensured.

The security of environments including personal data is ensured.

**Suppliers Accessing Personal Data**

“Confidentiality Agreement” is signed with the suppliers who can access personal data.

**Technical Protection Measures**

Network application security are ensured.

Closed system network is used for personal data transfers through the network.

Security measures are taken within the scope of procurement, development and maintenance of information technology systems.

Access logs are kept regularly.

Updated anti-virus systems are used.

Firewalls are used.

The signed contracts includes data security provisions.

The security of environments including personal data is ensured.

Personal data is backed up and the security of the backed up personal data is ensured.

User account management and authorization control system is implemented and these are also followed.

If sensitive personal data is to be transferred through e-mail, it is sent in encrypted form and using KEP or corporate e-mail account.

Encryption is used.

Data processing service providers are periodically controlled on data security.

### **Transfer Of Personal Data**

Information including personal data is shared with government institutions, banks, insurance companies and private public institutions and organizations in the sector which the company is affiliated with.

Information is shared by using secure communication tools provided by these institutions.

### **Transfer Of Personal Data Abroad**

Information including personal data is used by Sanem Plastik abroad is not transferred abroad for the purpose of processing personal data.

However, our e-mail system is based on a reliable company established abroad and within the borders of the European Union. It is used as a service that has taken adequate security measures and standards. Therefore, communication personal data is transferred abroad during the process.

### **Destruction Or Anonymization Of Personal Data**

It retains personal data only for as long as is necessary to achieve the purposes set out here, except where a longer period is legally required or permitted.



Although it has been stored and processed in accordance with the provisions of KVKK (Article 7) and other relevant legislation, personal data is deleted, destroyed or anonymized in case the reasons requiring processing disappear or the storage period expires.

Physical documents containing personal data are shredded in the machine and destroyed.

Personal data in the applications are formatted from the relevant media, databases and are also deleted from the backups and destroyed.

Personal data can be anonymized and processed for purposes such as research, planning and statistics. Anonymized information cannot be associated with the person in any way. For this reason it will be descope.

Our company performs these transactions at its own decision or at the request of the personal data owner.

Deletion, destruction and anonymization processes are carried out according to laws, regulations and decisions.

The necessary procedure has been established to carry out this work.

### **Rights Of The Data Subject**

According to the Constitution, everyone has the right to be informed about their personal data.

Our company, in accordance with the "compliance with law and honesty" rule, with personal data processing activities when necessary it provides accurate information and transparency to personal data owners and related parties.

The legal reason and the rights of the personal data owner are clarified about the purpose for which personal data will be processed during the acquisition of personal data, to whom and for what purpose the processed personal data will be transferred, the method of collecting personal data.

Personal data owners has the right to question about what their collected, stored, processed and transferred information is and for what purpose whether it is processed. In addition, they also have the right to request correction of in case of incomplete or incorrect processing this and to inform the relevant parties.

Personal data owners has the right to demand its destruction and to know the outcome of the request and they are responsible for their data stored or processed pursuant to legal regulations, in compliance with these requirements.

In this direction, as stated in Article 11 of the KVKK, the rights of data subjects' are listed below: ;

- a. To learn whether his personal data are processed or not,
- b. To request information if his personal data are processed,
- c. To learn the purpose of his data processing and whether this data is used for intended purposes,

- d. To know the third parties to whom his personal data is transferred at home or abroad,
- e. To request the rectification of the incomplete or inaccurate data, if any,
- f. To request the erasure or destruction of his personal data in the event that the reasons for processing are eliminated, although it has been processed in accordance with the provisions of this Act and other applicable law,
- g. To request notification of the operations carried out in compliance with subparagraphs (e) and (f) to third parties to whom his personal data has been transferred,
- h. To object to the processing, exclusively by automatic means, of his personal data, which leads to an unfavourable consequence for the data subject,
- i. To request compensation for the damage arising from the unlawful processing of his personal data.

### **Application To The Data Controller**

#### **Requisition**

The requests must be made to Sanem Plastik as written (Article 13 of the KVKK).

In your written request must include such points are listed below as;

- Your demand in a clear and understandable way,
- Identity (TR ID number, name, surname) information,
- Contact (e-mail, phone, address) information,
- Documents proving the identity and contact information of the data subject.

Applications must be made through the available application form.

- [Sanem Plastik Application Form](#) ↗

Sanem Plastik concludes the requests in the application free of charge as soon as possible and within thirty days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost, the fee in the tariff determined by the Board may be charged.

Sanem Plastik accepts the request or rejects it by explaining its reason and sends the answer to the data subject in written document or in an electronic form. If the request in the application is accepted, the data shall be carried out by the Data Controller. If the application is caused by the fault of Sanem Plastik then the fee will be refunded.

An issue that should not be forgotten (Article 14 of the KVKK) is : *“the right to complain”*.

In cases where the application is rejected, the answer given is insufficient or the application is not answered in due time; the data subject may file a complaint with the Board within thirty days from the date of learning the answer of the Data Controller and, in any case, within sixty days from the date of application. In accordance with the Article 13, no complaint can be made without exhausting the application option first. The right to compensation according to the general provisions of those whose personal rights are violated is reserved.

### **Data Controllers Registry**

Sanem Plastik has fulfilled its KVKK (Article 16) obligation and has registered to VERBIS (10001630).

### **Notifications To The Board And Violations**

Our company aims to fulfill its obligations under KVKK (Article 15) and within the legal deadlines and undertakes to make notifications.

### **Reviews**

Our company reviews this Policy once a year.

The Compliance with the Policy is checked by internal audit every year.

### **References**

The following were taken into account while preparing the Policy.

- T.R. Constitution
- Turkish Criminal Code No. 5237
- Law on Protection of Personal Data No. 6698, Regulations and Communiqués
- Personal Data Protection Board Decisions and Summaries of Decisions
- VERBIS
- All other laws and legislations where Personal Data is processed and Sanem Plastik is obliged to comply with
- Information Security Policy, other company policies, rules and procedures
- ISO 27001 Standard