

**KAR PORSELEN SANAYİ TİCARET ANONİM ŞİRKETİ**  
**PERSONAL DATA PROCESSING AND PROTECTION POLICY**

Version 2026/01

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## **1. PREAMBLE**

### **1.1. Purpose and Scope of the Policy**

Law No. 6698 on the Protection of Personal Data (hereinafter referred to as **the "Law"** and/or **"PDPL"** ) entered into force on 7 April 2016 and this Kar Porselen Sanayi Ticaret Anonim Şirketi Policy on the Processing and Protection of Personal Data of Employees / Employee Candidates / Interns (hereinafter referred to as the **"Employee Policy"** ), aims to ensure compliance of Kar Porselen Sanayi Ve Ticaret Anonim Şirketi(hereinafter rreferred to as **"Kar Porselen"** and/or **"Company"**) with the PDPL and to determine the principles to be followed in fulfilling the obligations regarding the protection and processing of personal data while processing the personal data of Kar Porselen employees.

The Policy on Processing and Protection of Personal Data determines the conditions for processing personal data and sets out the main principles adopted by Kar Porselen in the processing of employee personal data. Within this framework, it covers all personal data processing activities within the scope of PDPL by Kar Porselen, all employees / prospective employees / interns whose personal data are processed by Kar Porselen and all personal data processed by Kar Porselen.

Definitions of terms used in this policy are given in Annex-1.

### **1.2. Effective Date and Amendment**

This Policy has been published at <https://karporselen.com/> and submitted to the information of those concerned. Kar Porselen reserves the right to make changes in the policy in accordance with legal regulations. In case of conflict between the provisions of the PDPL and the policy, the provisions of the legislation in force shall apply.

## **2. DATA SUBJECTS, PURPOSES OF DATA PROCESSING AND DATA CATEGORIES COVERED BY THE POLICY**

### **2.1. Data Subjects Covered by the Policy**

Data subjects within the scope of the policy are all Kar Porselen Employees / Candidate Employees / Interns whose personal data are processed by Kar Porselen.

### **2.2. Purposes of Processing Personal Data**

#### **2.2.1.General Purposes Regarding the Processing of Personal Data of Employees/Candidate Employees/Interns**

Your personal data and sensitive personal data can be processed by Kar Porselen for the following purposes in accordance with the personal data processing conditions:

MAIN OBJECTIVES	SUB-OBJECTIVES
<p><b>Carrying out the necessary work by our business units to ensure that the relevant persons benefit from the services offered by the Company and carrying out the relevant business processes,</b></p>	<ol style="list-style-type: none"> <li>1. Follow-up of Requests and Complaints</li> <li>2. Follow-up of Contract Processes and Legal Requests</li> </ol>
<p><b>Ensuring the legal, technical and commercial-business security of the Company and related persons who are in business relations With the company.</b></p>	<ol style="list-style-type: none"> <li>1. Planning and Execution of Operational Activities Required to Ensure that Company Activities are Carried Out in Accordance with Company Procedures and Relevant Legislation</li> <li>2. Planning and Execution of Occupational Health and Safety Processes</li> <li>3. Ensuring that the data is accurate and up-to-date</li> <li>4. Providing Legislative Information to Authorised Institutions</li> <li>5. Ensuring the Security of the Company, Campus and Facilities</li> <li>6. Creating and Tracking Visitor Records</li> <li>7. Ensuring the Security of Company Operations</li> <li>8. Ensuring the Security of Company Fixtures and Resources</li> <li>9. Follow-up of Legal Affairs,</li> <li>10. Planning and Execution of Company Audit Activities</li> </ol>
<p><b>Planning and execution of the company's human resources policies and processes,</b></p>	<ol style="list-style-type: none"> <li>1. Fulfilment of Labour Contract and Regulatory Obligations for Employees</li> <li>2. Employees/ Candidate Employees/ Interns</li> <li>3. Monitoring and Supervision of Business Activities</li> <li>4. Planning Human Resources Processes</li> <li>5. Planning and Execution of Internal Appointment-Promotion and Resignation Processes</li> <li>6. Planning and Execution of the Authorisations of Employees / Candidate Employees / Interns to Access Information</li> <li>7. Planning and Execution of Corporate Communication for Employees/Candidate Employees/Interns and Corporate Social Responsibility and Non-Governmental Organisations Activities in which Employees Participate</li> <li>8. Planning and Execution of Talent-Career Development Activities</li> <li>9. Planning and Follow-up of Performance Evaluation Processes Planning and Execution of Fringe Benefits and Benefits for Employees/Candidate</li> </ol>

	<p>Employees/Interns</p> <ol style="list-style-type: none"> <li>10. Planning and Execution of Employee Exit Procedures</li> <li>11. Planning and Execution of the Processes of Receiving and Evaluating the Suggestions of Employees for the Improvement of Company Processes</li> <li>12. Planning and Execution of Employee/Candidate Employee/Intern Satisfaction and Loyalty Processes</li> </ol>
<p><b>Carrying out the necessary work by our relevant business units for the realisation of the activities carried out by the Company and carrying out the related business processes</b></p>	<ol style="list-style-type: none"> <li>1. Planning and Execution of Business Activities</li> <li>2. Planning and Execution of Corporate Communication Activities</li> <li>3. Follow-up of Finance and Accounting Affairs</li> <li>4. Planning and Execution of Business Continuity Ensuring Activities</li> <li>5. Incident Management</li> <li>6. Planning, Auditing and Execution of Information Security Processes</li> <li>7. Establishment and Management of Information Technologies Infrastructure</li> <li>8. Corporate Governance Planning and Execution of Activities</li> <li>9. Planning, Supporting and Execution of Research and Development Activities</li> </ol>
<p><b>Planning and execution of the Company's operational, commercial and business strategies</b></p>	<ol style="list-style-type: none"> <li>1. Planning and Execution of External Training Activities</li> <li>2. Management of Relations with Business Partners and Suppliers</li> <li>3. Execution of Strategic Planning Activities</li> <li>4. Planning and Execution of Distance Education Centre Activities</li> </ol>
<p><b>Planning and execution of the activities necessary for the presentation, recommendation and promotion of the Company's programmes and services to the relevant persons</b></p>	<ol style="list-style-type: none"> <li>1. Planning and Execution of Company Programmes and Services Planning and Execution of Processes for Creating and Increasing Commitment to the Company</li> <li>2. Planning and Execution of Company Satisfaction Activities</li> <li>3. Planning and Execution of Marketing Processes of Company Programmes and Services</li> </ol>

### 2.2.2. Activities Conducted Regarding the Processing of Personal Data of Employees

The following information is provided regarding the personal data processing activities carried out by Kar Porselen within the framework of the business relationship established with its employees.

- All data such as data on telephone conversations (not the content of the conversation, only the number and how long it was spoken to), e-mail contents and the date of sending within

the framework of *monitoring of communication, e-mail and internet traffic* activities, and all internet traffic information regarding the internet access provided in the Company's facilities and premises due to Law No. 5651 (Law on the Regulation of Publications Made on the Internet and Combating Crimes Committed through These Publications) can be monitored by Kar Porselen and processed when necessary. It is forbidden to use the communication, e-mail and internet services allocated to employees by Kar Porselen for private purposes other than work.

- Within the framework of *activities to combat discipline and irregularities* personal data of employees can be processed. Various employee personal data may be processed through disciplinary investigations initiated to reveal irregular transactions, as well as all kinds of data processing activities such as comparisons regarding all data that can be obtained from within or outside the company.
- *Some parts of the Kar Porselen campus can be monitored with security cameras* and images may be processed for the purposes specified in this Employee Policy.
- *The computers allocated by Kar Porselen* can be followed up and your personal data in electronic devices can be processed. It is forbidden to use these electronic devices for private purposes outside of work and to store private personal data in these devices outside of work.
- Personal data can be processed for the purpose *planning fringe benefits and benefits of employees* for example, providing health insurance to the employee. In case of data transfer to third parties within the scope of planning the establishment of ancillary rights and benefits, care is taken to transfer limited to the purpose. If the transferred data is personal data of special nature, additional measures are taken by Kar Porselen.
- *Health data of employees*, are endeavoured to be processed in the narrowest possible scope. As a rule, health data can be accessed only by authorised employees and to the extent such access is necessary. In cases where it is necessary to process health data, information is provided to ensure that the persons authorised to carry out this processing understand the sensitivity of this data and take the necessary measures.
- *Regarding administrative management, monitoring and control of company vehicles*, the vehicles used by Kar Porselen officials are tracked by Kar Porselen during working hours for security purposes and to ensure and monitor compliance with traffic rules.

### 3. PERSONAL DATA CATEGORIES

Kar Porselen processes personal data categorised below based on one and/or more of the personal data processing conditions specified in Articles 5 and 6 of the PDPL within the scope of employee personal data processing activities carried out by Kar Porselen.

<b>PERSONAL DATA CATEGORISATION</b>	<b>DESCRIPTION</b>
<b>Identity Data</b>	All information about the identity of the person in documents such as driving licence, identity card, residence card, passport, lawyer ID, marriage certificate
<b>Contact Details</b>	Information for contacting the data subject such as telephone number, address, residence, e-mail
<b>Family Members and Relatives</b>	Information about the family members and relatives of the personal data subject, which is processed in relation to the products and services we offer or to protect the legal interests of the Company and the data subject
<b>Physical Space Security Information</b>	Personal data related to records and documents such as camera recordings, fingerprint records taken at the entrance to the physical space, during the stay in the physical space
<b>Transaction Security Data</b>	Your personal data processed to ensure our technical, administrative, legal and commercial security while conducting our commercial activities
<b>Financial Information</b>	Personal data processed regarding information, documents and records showing all kinds of financial results created according to the type of legal relationship established by our company with the personal data subject
<b>Employee Data</b>	Personal data processed regarding information, documents and records showing all kinds of financial results created according to the type of legal relationship established by our company with the personal data subject
<b>Employee Transaction Data</b>	Personal data processed in relation to all kinds of business-related transactions carried out by our employees or natural persons in a working relationship with our Company
<b>Employee Performance and Career Development Data</b>	Personal data processed for the purpose of measuring the performance of our employees or real persons in a working relationship with our Company and planning and executing their career development within the scope of our Company's human resources policy
<b>Fringe Benefits and Benefits Data</b>	Personal data processed for the planning of the fringe benefits and benefits that we offer and will offer to our employees or other natural persons who are in a working relationship with our Company, determining the objective criteria for entitlement to them and monitoring the entitlement to them
<b>Legal Procedure and Compliance Data</b>	Personal data processed within the scope of determination and follow-up of our legal receivables and rights and performance of our debts and compliance with our legal obligations and our Company's policies

<b>Audit and Inspection Data</b>	Personal data processed within the scope of our Company's legal obligations and compliance with Company policies
<b>Sensitive Personal Data</b>	Data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data
<b>Request/Complaint Management Data</b>	Personal data relating to the receipt and evaluation of any request or complaint addressed to our Company
<b>Reputation Management Data</b>	Information about the information collected for the purpose of protecting the commercial reputation of our company and the evaluation reports created in this regard and the actions taken
<b>Incident Management Data</b>	Personal data processed in order to take necessary legal, technical and administrative measures against the events that develop in order to protect the commercial rights and interests of our company and the rights and interests of our students

#### 4. PRINCIPLES AND CONDITIONS REGARDING THE PROCESSING OF PERSONAL DATA

##### 4.1. Principles Regarding the Processing of Personal Data

Your personal data is processed by Kar Porselen in accordance with the personal data processing principles set out in Article 4 of the PDPL. These principles must be complied with for each personal data processing activity:

- ***Processing of personal data in accordance with the law and good faith:*** Kar Porselen acts in accordance with the laws, secondary regulations and general principles of law in the processing of your personal data and it attaches importance to processing personal data limited to the purpose of processing and taking into account the reasonable expectations of data subjects.
- ***Personal data is accurate and up-to-date:*** Kar Porselen pays attention to whether your personal data processed by Kar Porselen is up to date and checks are made regarding this. In this context, data subjects are entitled to request the correction or deletion of their data that is not accurate and up-to-date.
- ***Processing of personal data for specific, explicit and legitimate purposes:*** Kar Porselen determines the purposes of data processing before each personal data processing activity and ensures that these purposes are not unlawful.
- ***Personal data is relevant, limited and proportionate to the purpose for which it is processed:*** Data processing activity by Kar Porselen is limited to the personal data required to fulfil the purpose of collection and necessary steps are taken to ensure that personal data not related to this purpose are not processed.

- ***Retention of personal data for the period required by the legislation or processing purposes:*** Personal data are deleted, destroyed or anonymised by Kar Porselen after the purpose of processing personal data disappears or upon expiration of the period stipulated in the legislation.

#### **4.2. Conditions Regarding the Processing of Personal Data**

Your personal data is processed by Kar Porselen in the presence of at least one of the personal data processing conditions specified in Article 5 of the PDPL. Explanations regarding these conditions are given below:

- ***Explicit consent of the personal data subject:*** in cases where other data processing conditions do not exist, Kar Porselen may process the personal data of the data subject, with the free will of the data subject, with sufficient information about the personal data processing activity, in a manner that leaves no room for hesitation and only if the data subject gives consent limited to that transaction in accordance with the general principles under the heading 3.1.
- ***The personal data processing activity is clearly stipulated in the laws:*** personal data may be processed by Kar Porselen without the explicit consent of the data subject. In this case, Kar Porselen will process personal data within the framework of the relevant legal regulation.
- ***If the explicit consent of the data subject cannot be obtained due to actual impossibility and personal data processing is mandatory*** in the event that personal data belonging to the data subject who is unable to disclose his/her consent or whose consent cannot be validated by Kar Porselen, personal data will be processed in the event that personal data processing is mandatory to protect the life or physical integrity of the data subject or a third person.
- ***If the personal data processing activity is directly related to the establishment or performance of a contract and*** if it is necessary to process personal data belonging to the parties of the contract established or already signed between the data subject and Kar Porselen, personal data processing activity will be carried out.
- ***If it is mandatory to carry out personal data processing activities in order to fulfil the legal obligation of the data controller*** Kar Porselen processes personal data in order to fulfil its legal obligations stipulated under the applicable legislation.
- ***The data subject has made his/her personal data public:*** personal data that have been disclosed to the public in any way by the data subject and made available to everyone as a result of publicization may be processed by Kar Porselen limited to the purpose of publicization even without the explicit consent of the data subjects.
- ***Processing of personal data is mandatory for the establishment, exercise or protection of a right:*** Kar Porselen will be able to process the personal data of the data subject without the explicit consent of the data subjects within the scope of the obligation.

- ***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 subject:*** Personal data may be processed by Kar Porselen provided that the balance of interests of Kar Porselen and the data subject is observed. In this context, in the processing of data based on legitimate interest, Kar Porselen first determines the legitimate interest to be obtained as a result of the processing activity. It evaluates the possible impact of the processing of personal data on the rights and freedoms of the data subject and carries out the processing activity if it is of the opinion that the balance is not disturbed.

## 5. CONDITIONS FOR THE PROCESSING OF SENSITIVE PERSONAL DATA

Article 6 of the PDPL stipulates sensitive personal data that shall be process to the limited extent. These are; race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and outfit, membership of associations, foundations or trade unions, health, sexual life, criminal conviction and security measures, and biometric and genetic data.

Kar Porselen may process sensitive personal data in the following cases by ensuring that additional measures determined by the Personal Data Protection Board are taken:

- ***Processing of sensitive personal data other than health and sexual life:*** they can be processed if the data subject gives explicit consent or in case it is explicitly stipulated in the laws.
- ***Personal data relating to health and sexual life,*** however, can be processed for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, by persons under the obligation of confidentiality or authorised companies and institutions without seeking the explicit consent of the data subject.

## 6. TRANSFER OF PERSONAL DATA

In accordance with the additional regulations listed in Articles 8 and 9 of the PDPL and determined by the Personal Data Protection Board; Kar Porselen may transfer personal data domestically or abroad if the conditions for the transfer of personal data are met.

- ***Transfer of personal data to third parties in Turkiye:*** *your* personal data may be transferred by Kar Porselen in the presence of at least one of the data processing conditions specified in Articles 5 and 6 of the PDPL and explained under Title 3 of this Policy and provided that the basic principles regarding the data processing conditions are complied with.
- ***Transfer of personal data to third parties abroad:*** *in* cases where the person does not have explicit consent, *your* personal data may be transferred abroad by Kar Porselen in the presence of at least one of the data processing conditions specified in Articles 5 and 6 of the PDPL and explained under Heading 3 of this Policy and provided that the basic principles regarding the data processing conditions are complied with.

In the event that the country to which the transfer will be made is not one of the safe countries to be announced by the Personal Data Protection Board, personal data may be transferred to third parties abroad upon the written undertaking of adequate protection by Kar Porselen and the data controller in the relevant country, upon the Personal Data Board's authorisation of this processing and in the presence of at least one of the data processing conditions specified in Articles 5 and 6 of the PDPL (see Policy Heading 3). Within the framework of general principles of PDPL and the data processing conditions in Articles 8 and 9, Kar Porselen can transfer data to the parties categorised in the table below:

<b>SHARED PARTY CATEGORISATION</b>	<b>SCOPE</b>	<b>PURPOSE OF TRANSFER</b>
<b>Business Partner</b>	Parties with which Kar Porselen establishes business partnerships while conducting its commercial activities	Sharing of personal data limited to the purpose of ensuring the fulfilment of the purposes for which the business partnership was established
<b>Supplier</b>	Parties that provide services for Kar Porselen to continue its commercial activities in line with the instructions received from Kar Porselen and based on the contract between Kar Porselen and Kar Porselen	Transfer limited to the receipt of outsourced services from the supplier
<b>Legally Authorised Public Institution</b>	Public institutions and organisations legally authorised to receive information and documents from Kar Porselen	Sharing personal data limited to the purpose of requesting information by the relevant public institutions and organisations
<b>Authorised Private Institution</b>	Institutions and/or persons authorised to receive information and documents from Kar Porselen due to the service provided	Sharing data limited to the purpose requested by the relevant institutions and/or persons within the scope of their authorisation

## 7. DISCLOSURE TO EMPLOYEES AND THEIR RIGHTS

According to Article 10 of the LPPD, data subjects must be informed about the processing of personal data before or at the latest at the time of processing personal data. In accordance with the relevant article, the necessary internal structure has been established to ensure that data subjects are enlightened in every situation where personal data processing activities are carried out by Kar Porselen as the data controller. In this context;

- Please refer to section 2.2 of the Policy for the purpose of processing your personal data.
- Please see Section 4 of the Policy for the parties to whom your personal data are transferred and the purpose of transfer.
- Please refer to sections 3.2 and 3.3 of the Policy to examine the legal reasons for processing your personal data, which can be collected through different channels in physical or electronic media.
- As a data subject, we would like to state that you have the following rights in accordance with Article 11 of the PDPL:
  - To learn whether your personal data is being processed,
  - To request information if your personal data has been processed,
  - To learn the purpose of processing personal your data and whether they are used in accordance with their purpose,
  - To know the third parties to whom personal your data are transferred domestically or abroad,
  - To request correction of your 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 your personal data has been 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 PDPL and other relevant PDPL provisions, and to request notification of the transaction made within this scope to third parties to whom your personal data has been transferred,
  - To object to the occurrence of a result to your detriment by analysing the processed data exclusively through automated systems,
  - In case you suffer damage due to the processing of your personal data in violation of the PDPL, to demand the compensation of the damage.

Your applications for your rights listed above can be sent to our Company by filling out the Data Subject Application Form which is available at <https://karporselen.com/> or can be requested from the information desk. Depending on the nature of your request, your applications will be finalised free of charge as soon as possible and within thirty days at the latest; however, if the transaction requires an additional cost, you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board.

During the evaluation of the applications, Kar Porselen first determines whether the person making the request is the real right holder or not. However, Kar Porselen may request detailed and additional information for a better understanding of the request when deemed necessary.

Responses to data subject applications by Kar Porselen are notified to data subjects in writing or electronically. If the application is rejected, the reasons for rejection will be explained to the data subject with justification.

## **8. DELETION, DESTRUCTION, ANONYMISATION OF EMPLOYEE PERSONAL DATA**

According to Article 7 of the PDPL, although it has been processed in accordance with the legislation, in the event that the reasons requiring its processing disappear, Kar Porselen deletes, destroys or anonymises the personal data of the employees ex officio or upon the request of the employee in accordance with the guidelines published by the Company.

## **9. LIMITATIONS ON THE SCOPE AND APPLICATION OF THE PDPL**

Pursuant to Article 28 of the PDPL, the following situations are outside the scope of PDPL:

- Processing of personal data by natural persons within the scope of activities related to themselves or their family members living in the same residence, provided that personal data are not disclosed to third parties and the obligations regarding data security are complied with.
- Processing of personal data for purposes such as research, planning and statistics by anonymising them with official statistics.
- Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defence, national security, public security, public order, economic security, privacy of private life or personal rights or constitute a crime.
- Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organisations entrusted and authorised by law to ensure national defence, national security, public safety, public order or economic security.
- Processing of personal data by judicial authorities or enforcement authorities in relation to investigation, prosecution, judgement or execution proceedings.

Pursuant to Article 28 of the PDPL; in the cases listed below, Kar Porselen is not required to inform its employees and employees will not be able to use their rights specified in the LPPD, except for their rights regarding the compensation of damages:

- Processing of personal data is necessary for the prevention of crime or criminal investigation.
- Processing of personal data made public by the data subject himself/herself.
- Processing of personal data is necessary for the execution of supervisory or regulatory duties and disciplinary investigation or prosecution by the public institutions and organisations and professional organisations in the nature of public institutions, which are authorized and empowered based on the authority granted by the PDPL.
- Processing of personal data is necessary for the protection of the economic and financial interests of the State in relation to budgetary, tax and fiscal matters.

## 10. ANNEX-1: DEFINITIONS

DESCRIPTION	
<b>Explicit Consent</b>	Refers to consent on a specific subject, based on information and expressed with free will,
<b>Anonymisation</b>	Making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even by matching with other data.
<b>Employee</b>	Real persons who are employees of Kar Porcelain.
<b>Employee Candidate</b>	Real persons who are not employees of Kar Porselen but have the status of Kar Porselen employee candidate through various methods
<b>Personal Health Data</b>	Any health information relating to an identified or identifiable natural person.
<b>Personal Data</b>	refers to any information relating to an identified or identifiable natural person.
<b>Data Subject</b>	Refers to the natural person whose personal data is processed,
<b>Processing of personal data</b>	Refers to all kinds of operations 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 they are part of any data recording system.
<b>PDPL</b>	Law Nr. 6698 on the Protection of Personal Data published in the Official Gazette dated 7 April 2016 and numbered 29677.
<b>Sensitive Personal Data</b>	Refers to 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,
<b>Policy</b>	Kar Porselen Sanayi Ticaret Anonim Şirketi Personal Data Processing

