

## CLARIFICATION TEXT

### ON THE PERSONAL DATA PROTECTION LAW NO. 6698

In order to protect the fundamental rights and freedoms of individuals, especially the protection of privacy, and to determine the obligations of real and legal persons who process personal data, the **Law on the Protection of Personal Data No. 6698 ("LPPD")** has entered into force. As **Energo Pro Turkey Holding Joint Stock Company ("Company")**, we attach utmost importance to ensuring the security of your personal data. As a matter of fact, all kinds of personal data (first name, last name, T.R. identification number, address, place of birth, date of birth, etc.) that you have shared with the Company in accordance with the LPPD, and again, any qualified private data (health information, biometric and genetic information, dress, associations, foundations, trade union membership, criminal convictions and security measures, data on religious, ethnic, etc. all kinds of data) that contain any and all information and documents by the company in his/her capacity as responsible for the data, in accordance with the regulations of the relevant law (By obtaining your explicit consent, except for exceptional cases that do not require explicit consent regulated in the LPPD) can be processed, can be saved and can be stored, in order to continue the services of personal data, it is processed in accordance with the law and the good faith, the accuracy of the data is ensured and it can be updated and stored when necessary, it can be transferred to third parties, shared and anonymized. The categories of personal data are specified in detail in **Annex-1**.

Our personal data protection and processing policy, aims to protect the data obtained from our customers, customer candidates, suppliers, business partners or cooperated companies, institutions and organizations, customers and employees or other persons working together with our employees and includes regulations related to this. For this reason, in the capacity of data controller, in accordance with Articles 10 and 11 of the LPPD titled "Data Controller's Clarify to", in the following ways and for the purposes, your personal data is processed in accordance with the relevant legislation by specifying what your rights are.

#### **1. Collection, Processing and Processing Purposes of Personal Data**

Your personal data may vary depending on the service, product or commercial activity provided by our Company, with automatic or non-automatic methods, our company and our member establishments, offices, branches, dealers, call center, website, social media channels, mobile applications, third party, legal authorities, and with similar means as oral, written, or electronically will be collected. In addition, when you use our website with the intention of using the Company's services or use other services in which our company operates, when you participate in trainings, seminars or organizations organized by our Company, it may be processed.

Your personal data collected from you for the products and services offered by our company giving you the benefit of the work required to be done by our business units, the fulfillment of our activities, sustainability, development, products and services offered by our company tastes, habits and you propose customized according to your needs by our company and/or customer satisfaction programs under the management of our member companies/ brands advertising for you, and analyzed by custom, campaign, and deliver other benefits, let's preferences in accordance with commercial electronic messages can be sent before forwarding mail survey of applications, your use of accommodation and other services to data reporting and evaluation, performing statistical analysis, our company has a business relationship with the legal and commercial security of our company and the people who are in provision (Administrative Operations for communication carried out by our company, company-owned locations to ensure the physical security and control of the partner/customer/supplier (authorized employees or) evaluation processes, legal compliance process, financial affairs v.b.), The company's commercial and business strategies formulation and implementation of human resources policies and the execution of the company's e-mail in the environment, e-mails, e-newsletter, membership, social media shares, printed forms filled in organized activities, employee candidates face to face during the interview, application form, written or electronic media, digital application form to be sent via e-mail or cargo, send in their resumes or consulting firms with similar methods and tools such as confirmation of any information you transmit to or telephone the candidate and the research that provides control and due to the work with personal data in the recruitment process is collected according to the nature of the business relationship of the individuals collected personal data of a private nature within the maintenance of the legal and commercial security, legal and financial affairs of the commercial and business strategies, implementation, human resources (employees in order to get a certificate of criminal record and health, etc.), execution of accounting policies, ensure physical security and control of domestic and international regulatory compliance, public agencies, or other authorities of the requested information transfer, storage, reporting their obligations to comply with Article 5 and Article 6 of the LPPD for the purpose of supplying the conditions and for the purposes specified in the processing of personal data will be processed. We may share your personal data that we process for this purpose with our subsidiaries, business partners, suppliers, company officials, shareholders, group companies and affiliated companies: Bilsev Enerji Üretim ve Ticaret A.S., Murat Nehri Enerji Üretim A.S., Energo-Pro Güney Elektrik Top. Sat.İht. İhr. Ve Tic.A.S., Reşadiye Hamzalı Elektrik Üretim San. Ve Tic. A.S.

Berta Enerji Elektrik Üretim San. Ve Tic. A.S., Energo Pro İnşaat San. Ve Tic. A.S. located in Turkey and abroad, public institutions and private individuals authorized by law.

## **2. To Whom and for What Purposes the Processed Personal Data Can Be Transferred**

To carry out the necessary works by our business units in order to benefit you from the collected personal data, the products and services offered by our Company/Companies, The products and services offered by our company are customized according to your tastes, usage habits and needs and recommended to you, by analyzing by our company and / or the companies / brands that are members of the customer satisfaction programs that managing and to offering you special advertising, campaigns and other benefits, sending commercial electronic messages in accordance with your permission preferences, forwarding mail, survey and teleselling applications, reporting and evaluation of your shopping data, conducting statistical analyses, A business relationship with our company and our legal and commercial security of the company of people who are in provision (Administrative Operations for communication carried out by our company, company-owned locations to ensure the physical security and control of the partner/customer/supplier (authorized employees or) evaluation processes, legal compliance process, financial affairs, etc.), The identification and implementation of commercial and business strategies of our company with the execution of our company's human resources policies for the purposes of the provision of member merchants, business partners, shareholders, law enforcement, public institutions and private persons, legal, financial and tax advisors, auditors and Article 8 and 9 of the LPPD conditions and for the purposes that are specified in the processing of personal data may be transferred. Your personal data (identification data, communication data, customer data, Family data, customer transaction information, financial information, personal data, security information, etc.), which can be kept at home or transferred abroad for the realization of the above-mentioned purposes by taking the necessary security measures. In case of transfer abroad, it is necessary to have adequate protection in the foreign country to which the personal data will be transferred, and in case of insufficient protection, the data controllers in Turkey and the relevant foreign country must undertake adequate protection in writing and have the permission of the Personal Data Protection Authority.

## **3. The Methods and Legal Reasons of Collection of Personal Data**

Your personal data, on any oral, written, or electronic medium, our website, our social media, business relationship and/or other similar organizations contracted by the service we received and the complementary nature of our activities through channels designated for implementation of the products and services we provide in line with the above objectives can be presented in the legal framework and in this context, our company arising from the contract and the law in a manner to fulfill the purpose of the liability is obtained with complete and accurate. of the products and services we provide in line with the above objectives can be presented in the legal framework and in this context, our company arising from the contract and the law in a manner to fulfill the purpose of the liability is obtained with complete and accurate. Your personal data collected for this legal reason may also be processed and transferred for the purposes specified in articles (1) and (2) of this text within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the LPPD.

This information form is an additional and integral part of your requests for all kinds of contracts and service purchases that you have signed with our Company.

## **4. Time the Personal Data to Be Stored**

Our Company retains personal data only for the period specified in the relevant legislation or necessary for the purpose for which they are processed. Herein, first of all, if a period of time is determined for the storage of personal data in the relevant legislation, it acts in accordance with this period, and if a period of time is not determined, it stores personal data for the period necessary for the purpose for which they are processed. In case of the expiration of the period or the disappearance of the reasons requiring processing, the personal data will be deleted, destructed or anonymized and will be able to continue to be used by our Company.

## **5. RIGHTS OF THE PERSONAL DATA SUBJECT SET IN ARTICLE 11 OF THE LPPD**

As personal data subjects, if you submit your requests regarding your rights to our Company by the methods set out below in this Clarification Text, our Company will finalize the request free of charge within thirty days at the latest, depending on the nature of the request. However, if a fee is stipulated by the Personal Data Protection Board, the fee in the tariff determined by our Company will be charged. In this context, personal data subjects have the rights of;

- a) Learning whether personal data is processed or not,
- b) If personal data has been processed, request information about it,
- c) To learn the purpose of the processing of personal data and whether they are used in accordance with the purpose,
- d) To know the third parties to whom personal data is transferred in the domestic or abroad,
- e) To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made in this context to the third parties to whom the personal data has been transferred,
- f) Although it has been processed in accordance with the provisions of the LPPD and other relevant laws, in case the reasons requiring its processing destruction, to request the deletion or destruction of personal data and to request that the transaction made in this context be notified to the third parties to whom the personal data has been transferred,
- g) By analyzing the processed data exclusively through automated systems, one don't argue with the emergence of a result against one's self,
- h) To request the compensation of the damage in case of damage due to the unlawful processing of personal data.

In accordance with paragraph 1 of Article 13 of the law KVK, the above-mentioned exercise the rights related to your request, in writing, your identity as required and requested identifying information with other information specified in Article 11 of the KVK law, the rights to use your comments for Protect your right to request it to you containing your request to this e-mail address: [kvkk.eptoptan@energo-pro.com](mailto:kvkk.eptoptan@energo-pro.com) , you can pass your identity to hand personally identifying documents, can forward the return by registered mail, it can be sent through a notary public or by other methods specified in the LPPD or you can forward the registered electronic mail (REM) by using the secure electronic signature, mobile signature or the electronic mail address previously notified to the data controller by the relevant person and registered in the data controller's system. Our company may reject your application by explaining the reason.

You can reach the detailed information and application form for the application from the link below.

**ANNEX 1: The Categories of Personal Data**

<b>Data Category</b>	
Identity Information	First Name, Last Name, ID information (TR identity number, identity card no, father's name, Mother's name, place of birth, City, District, Sub-district, volume no, Family, Order Number, number individual , Section no, page number, registration number, place of issue, issued for, date of issue, previous surname), nationality, marital status, date of birth, copy of identity card, vehicle information, movements and IP addresses of computers used by employees for business web navigation, hobbies, exit interview reports, discharge certificate, book the use of annual leave, exit interview forms, SSI Registration Number, tax rebate caption, height, weight, employee internet access logs.
Contact Information	Home and mobile phone number, address information, e-mail addresses, intracompany contact information (internal phone number, corporate e-mail address)
Financial Information	Financial and salary details, payrolls, premium claims, files and debt information related to execution follow-up files, bank information, minimum subsistence allowance information, individual pension and personal accident insurance amount and information and so on.
Sensitive Personal Data	Trade union, ex-convict status and criminal record, health insurance, disability-related health reports, health declaration is a document, health reports, pregnancy status, pregnancy report, occupational disease records, the entrance examination takes the form of daily patient complaints, drugs that using, clinical history, additional tests, hearing tests, eye tests, blood group information, the entrance and periodic examination forms signed by the workplace physician, religious information located in the identity card, the blood group digit included in the driver's license document, association / foundation memberships and so on.
Educational Information	Education status, certificate and diploma information, foreign language information, education and skills, resume (CV)
Visual Data	Photo, closed-circuit security camera footage.
Employee Performance and Career Development Information	Training participation forms, training hours and durations, (if any) exam results, internal promotion evaluation processes (English, general aptitude exams, personality inventory),label non-compliance reports, personnel promotion transfer movements file, HR outbound search team rating and performance reports, meeting records, scorecards information, date of entry into work,weekly working hours (login-logout records), all other information that is specially entered by employees on the profile builder screen.
Operating Data	Registration number, position name, department and unit, title, due date of recruitment, start and due dates of work, insurance entry/retirement, allocation no, social security no, tax office no, availability of working flexible hours, holding company registration number, travel status, pension fund information, pension fund entry date, pension fund registration number, accounting code, number of working days, projects he/she worked on, monthly total overtime information, severance pay base date, additional days of severance pay, the other day on strike, base date of seniority of leave, additional days of seniority allowed, permission group, departure/return date, day.
Family and Relative Information	Marriage certificate; wife and children's name, surname, T.R. Identification number, gender, date of birth; name, surname and phone number of family and relatives, family notification forms