

**The Text of Clarification on Processing of Personal Data
by Özdoku Textile Industry and Trade Joint-Stock Company
within the frame of the Nr. 6698 Law on Protection of Personal Data**

1. Purpose And Scope of The Text of Clarification

This Statement is made by Özdoku Textile Industry and Trade J.S.C's ("Özdoku") in accord with the importance it attaches to personal data of; our customers, potential customers, employees, our employee candidates, Company shareholders, Company officials, visitors, associates, suppliers, employees of our institutions in collaboration, our shareholders third parties ("Data subject" in short). We would like to inform data subject accordingly Protection and processing of personal data under the Nr.6698 Law on Protection of Personal Data ("KVKK").

The data included in The Text of Clarification on Processing of Personal Data ("Text") relates to all personal data of the person concerned that is automated or processed in non-automated ways, provided that it is part of any data recording system.

This text edited by our company is dated 08/07/2020 The effective date and version of the text will be updated if the whole text or certain articles are renewed. The effective date and version of the text will be updated.

The Text is published in our company's website www.ozdoku.com ("Website") and available to data subject at the request of the data subject.

2. Principles Regarding Personal Data

a. Processing of Personal Data

Our company processes your personal data based on one or several conditions indicated in KVKK's 10th Article in accord to the Constitution's 20th Article and KVKK's 4 Article in a manner that,

- Is in accord with the law and good faith,
- Is correct and up to date if when necessary,
- Pursues specific, explicit and legitimate objectives,
- Is in relation with its objectives,
- Is limited and restrained,
- Retains personal data until the law foresees or as long as the time that the objective for processing personal data requires.

Our company fulfills its disclosure requirement in accord with the Constitution's 20th Article and KVKK's 10th Article by informing data owners on subjects such as;

- The objective of processing personal data,
- Who and with what objective that the personal data in question could be transferred,
- The method and legal reason for collecting personal data,
- The rights of the data subject.
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b. Legal Reasons for Processing Personal Data

Our company processes legal data with the objectives that are stated in the KVKK's 5th article and below;

- The processing of personal data by our company is directly relevant or necessary to the formation or execution of a contract,
- The processing of personal data is necessary for our company to fulfill its legal obligation,
- The processing of personal data by our company is necessary for the establishment, exercise or protection of our company's or the data subject's or a third persons rights,
- The processing of personal data by our company is necessary for the legitimate interests of our company provided that the fundamental rights and freedoms of the data subject are not harmed.

In the KVKK's 6th article, a set of personal data which can bear the risk of causing victimization or discrimination towards the data subject if processed illegally is specified as "personal categories" of personal data. These data are; race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade-union, health, sexual life, criminal conviction and security measures, and biometrics and genetics. Data which falls into the personal category is processed by our company, provided that the sufficient precautions which are to be determined by the Board of Personal Data Protection (the Board) are taken, in the following situations;

- In the situations where the law foresees that it is fit to process personal data which is categorized as personal with the exclusion of related persons health and sexual life,
- Data concerning the related person's health and sexual life can only be taken by people who are under the obligation of confidentiality and competent institutions and organizations for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment, and care services, planning and management of health services and financing.

In the case of absence of the data processing conditions stated above our company shall obtain the consent of the related person.

c. Transfer of Personal Data

Our company can transfer the personal data determined in this Text's section 2.b. within the scope of objectives stated in the same section and with the objectives stated below;

- To transfer upon the requests made within the scope of authority of the relevant institutions and organizations to the legally competent public institutions and organizations,
- To transfer upon the requests made within the scope of authority of the concerned private legal persons to the legally competent private persons,
- Your personal data can be transferred abroad accordingly with the KVKK's 9th Article within the scope of carrying out our company's commercial and operational activities.

d. The Objective of Collecting Personal Data

Your personal data is being collected accordingly with the objectives indicated above with the object of providing and improving the goods and services that we offer and to carry out commercial activities. Your personal data is collected within this period via; our employees and agencies or public

data bases within the scope of the relevant legislation, by business cards collected by our company, by emails sent to company's email address extended with "info" with the legal reason of carrying out our commercial activities.

Your personal data collected with this legal reason could be processed and transferred with the objectives specified in this Text of Clarification's (b) and (c) articles within the scope of the Nr. 6698 Law's 5th and 6th articles.

Personal data is processed by our company for the reasons of providing services and to satisfy local legislation needs within the conditions specified above. Personal data is processed in accordance with the objectives stated below.

- Within the objective of carrying out our HR departments activities by employee recruitment in accord with HR policies
- Administrative operations directed towards communication, legal and commercial risk analyses, legal adaptation process and conducting financial affairs in accordance with the procurement of legal and commercial obligations of our company and people who have an employment relation with our company.
- Finance operations carried out by our company, communication, market research and social responsibility activities, purchasing operations (demand, offer, evaluation, order, budgeting, contract), determining and applying our company's commercial and business strategies within the objective of determining and applying our company's commercial and business strategies.

The personal data processed by our company within the scope of this text and the data subject has been categorically classified and indicated in KSV1 LIST.

e. Storing and Deleting Personal Data

Our company stores your personal data within the periods specified by the law. In the case of no specification by the law; your personal data is stored for a period of time that is necessary for our company's activities and commercial customs. After this period your personal data is stored for the purpose of constituting evidence for potential legal disputes for the necessary durations exhibited in practice. In the conclusion of the stated periods the data in question is deleted, eliminated or anonymized.

3. Rights of the Data subject

In the 20th article of the Constitution, it is stated that everyone has the right to be informed about personal data concerning himself/herself, and according to the 11th Article of KVKK, the data subject has the 'right to request information' regarding his data. In this context, our company provides the necessary information if the data subject requests information; with this statement our Company provides information to the data subject on how to use the right to request such information and how to evaluate the issues regarding the information request. The data subject has the following rights:

- Learning whether personal data is processed,
- Requesting information about processing if personal data has been processed,
- To learn the objective of processing personal data and whether it is used accordingly with its objective,

- To know the third parties to whom personal data are transferred domestically or abroad,
- Requesting correction of personal data in case of missing or incorrect processing, and requesting the notification of the transaction made within this scope to third parties to whom personal data has been transferred,
- Requesting the deletion or destruction of personal data if the reasons requiring its processing disappear even though it has been processed under the provisions of KVKK and other relevant laws, and requesting the notification of the transaction performed within this scope to the third parties to whom the personal data has been transferred,
- Objection to the occurrence of any result that is to her/his detriment through analysis of personal data exclusively through automated systems;
- Request the compensation for the damages in case the person incurs damages due to unlawful processing of personal data.

Under Article 28 of the KVKK, the following cases are excluded from the scope of the KVKK; the data subject may not claim the above-mentioned rights in these matters:

- Processing personal data for purposes such as research, planning, and statistics by anonymizing with official statistics.
- Processing personal data for art, history, literature, or scientific purposes or within the scope of freedom of expression, provided that they do not violate national defense, national security, public security, public order, economic security, privacy, or personal rights, or constitute a crime.
- Processing personal data within the scope of preventive, protective, and intelligence activities carried out by public institutions and organizations authorized by the law to provide national defense, national security, public security, public order, or economic security.
- Processing of personal data by judicial authorities or enforcement authorities regarding investigations, prosecutions, trials, or enforcement proceedings.

According to Article 28/2 of the KVKK, the data subject can not claim the above-mentioned rights, except for the right to request the removal of the damage, in the following matters;

- Processing of personal data is necessary for the prevention of crime or investigation of a crime.
- Processing of personal data revealed to the public by the data subject herself/himself.
- Processing of personal data is necessary, deriving from the performance of supervision or regulatory duties, or disciplinary investigation or prosecution by assigned and authorized public institutions and organizations and professional organizations with public institution status.
- Processing of personal data is necessary for the protection of economic and financial interests of the state.

The data subject can submit his/her requests regarding the rights mentioned above, to Akçaburgaz Mahallesi 319 Sokak No: 3 Esenyurt / İSTANBUL personally, by sending the form on www.ozdoku.com and sending it to our company via a notary or registered letter. For a person other than the data subject to make a request, there must be a special power of attorney issued on behalf of the person to apply by the data subject.

Duly requests submitted to our company will be finalized within thirty days at the latest. If the finalization of such requests also requires a cost, our Company will charge the applicant the fee in the tariff determined by the Board.

Our company may request information from the data subject to determine whether the applicant is a data subject, and may ask a question about his application to the data subject in order to clarify the issues specified in the application. Our company can reject the application of the applicant by explaining the reason for it in the situations below:

- Processing personal data for purposes such as research, planning, and statistics by anonymizing with official statistics.
- Processing personal data for art, history, literature, or scientific purposes or within the scope of freedom of expression, provided that they do not violate national defense, national security, public security, public order, economic security, privacy, or personal rights, or constitute a crime.
- Processing personal data within the scope of preventive, protective, and intelligence activities carried out by public institutions and organizations authorized by law to provide national defense, national security, public security, public order, or economic security.
- Processing of personal data by judicial authorities or enforcement authorities regarding investigations, prosecutions, trials, or enforcement proceedings.
- Personal data processing is necessary for crime prevention or criminal investigation.
- Processing of personal data that was made public by the data subject.
- The fact that personal data processing is necessary for the disciplinary investigation or prosecution by the authorized and authorized public institutions and organizations and the professional institutions that are public institutions based on the authority given by the law.
- Personal data processing is necessary for the protection of the State's economic and financial interests about budget, tax, and financial matters.
- The demand for data subject is likely to hinder other people's rights and freedoms.
- Made requests requiring disproportionate effort.
- The requested information has public access.

According to Article 14 of the KVKK, If the request is refused, the response is found insufficient or the request is not responded within the specified time, the data subject may complain with to the Board within thirty days as of he or she learns about the response of the our company, or within sixty days as of the requested date, in any case.

4. Security of Personal Data

a. Security Precautions

Under Article 12 of the KVKK, our company takes the necessary measures and controls to prevent the illegal processing of the personal data it processes, to prevent the data from being accessed unlawfully and to ensure the protection of the data, and performs the necessary controls and make an audit in this context. In this respect, the measures and controls taken by our Company are given below,

- Employment of personnel who are knowledgeable about establishing and operating systems that comply with the principles and relevant legislation regarding the processing of personal data,

- Providing training to ensure that the personnel are informed about personal data, and include provisions on the compliance of the personal data protection legislation and Company implementation rules in personnel contracts,
- Using backup programs that comply with the legislation, which ensure the safe storage of personal data,
- In the case that a service covering personal data processing processes is provided as outsourcing, in the contracts made with outsourcing companies, there are provisions regarding the security measures to be taken to protect personal data and that these measures will be followed in their organizations,
- To take the necessary technical and organizational measures to evaluate the personal data processing processes in all activities carried out by our company within the scope of the data processing conditions regulated by KVKK and to continue these processes in accordance with the provisions of KVKK,
- Determining the implementation rules for the management of personal data processing processes and compliance structure including measures and controls, and implementation of these rules.
- Maintaining and controlling personal data processing processes and systems related to these processes with management systems with technical and organizational features.

b. Audit

Our company conducts or has the necessary inspections performed within its organization under Article 12 of the KVK Law. These audit results are reported to the relevant department within the scope of the internal operation of the Company and the necessary activities are carried out to improve the measures taken.

Necessary systems are established and necessary training is provided to raise awareness of the current employees of the Company's business units and employees who are new to the business unit, in order to raise awareness about personal data protection.

c. Data Breach Management

Our company carries out the system that ensures that the personal data processed under Article 12 of the KVKK is illegally obtained by others and that this situation is reported to the data subjectal person and the Board as soon as possible. If deemed necessary by the Board, this may be announced on the Board's website or by any other method.

Özdoku Textile Industry and Trade Joint- Stock Company

KSV1_LIST

Related Data Group	Personal Data Processed
Customer Employee/Authorized or Potential Customer Employee	Identifying Information: Name-Surname Contact Information: Telephone Number, E-mail, Address, Social media account Personal Information: Potential Customer Employee Position, Potential Customer Employee Firm
Supplier/Producer	Identifying Information: Name-Surname Contact Information: Telephone Number, E-mail, Address, Social media account Personal Information: Potential Customer Employee Position, Potential Customer Employee Firm