

## Clarification Text for Employees

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### Dear Employees,

As Tempo Metal Aksesuar Sanayi ve Ticaret A.Ş., we would like to make a small explanation about our Personal Data Security Management System.

### Information on Law on the Protection of Personal Data Numbered 6698

As Tempo Metal Aksesuar Sanayi ve Ticaret A.Ş., we would like to inform you about the Law on the Protection of Personal Data ("LPPD") numbered 6698, which regulates the obligations of real and legal persons who process personal data and the procedures and principles to be complied with in the processing of personal data and to protect the fundamental rights and freedoms of the persons concerned, especially the privacy of private life. It may be processed by the Data Controller Tempo Metal Aksesuar Sanayi ve Ticaret A.Ş. within the scope described below.

### Some Terms and Definitions Related to the Law

**Personal Data:** Within the scope of this law, personal data is defined as "any information relating to an identified or identifiable natural person" and processing is defined as "any operation performed on personal data, such as the acquisition, recording, storage, retention, alteration, re-organization, disclosure, transfer, acquisition, making available, classification or prevention of 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".

**Sensitive personal data:** Data on 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.

**Processing of personal data:** "Any operation performed on personal data, such as the acquisition, recording, storage, retention, alteration, reorganization, disclosure, transfer, acquisition, making available, classification or prevention of 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".

**Explicit Consent:** It is defined as "consent regarding a specific subject, based on information and expressed with free will". As the Data Controller, we would like to inform you and obtain your explicit consent in order to fulfill our obligations under the law.

**LPPD:** Law on Protection of Personal Data

**Data Subject:** Only the data of natural persons are protected under the Law. Therefore, the term "data subject" is used in the Law to refer to the natural person whose personal data is processed. The person to be protected is the "natural person" as clearly stated in the definitions section of the regulation.

### Under Which Circumstances and for Which Purposes Your Personal Data May Be Processed?

According to Article 5 of the Law No. 6698 on the Protection of Personal Data, as a rule, personal data cannot be processed without the explicit consent of the data subject. However, in the presence of one of the following conditions, it is possible to process personal data without seeking the explicit consent of the data subject:

1. Processing is clearly stipulated in the laws,
2. It is mandatory for the protection of the life or physical integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid.
3. Processing of personal data of the parties of a contract is necessary provided that it is directly related to the establishment or performance of the contract.
4. It is necessary for compliance with a legal obligation to which the data controller is subject.
5. It has been made public by the person concerned.

6.Data processing is necessary for the establishment, exercise or protection of any right.

7.Processing of personal data is necessary for the legitimate interests pursued by the controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

According to Article 6 of the Personal Data Protection Law, it is prohibited to process sensitive personal data without the explicit consent of the data subject. Sensitive personal data: 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 are sensitive personal data.

However, special categories of personal data other than the aforementioned health and sexual life may also be processed without the explicit consent of the data subject in cases stipulated by law. Personal data relating to health and sexual life can only be processed by persons or authorized institutions and organizations under the obligation of confidentiality for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, without seeking the explicit consent of the data subject.

In the processing of special categories of personal data, adequate measures determined by the Board must also be taken.

Your personal data may be processed by Tempo Metal Aksesuar Sanayi ve Ticaret A.Ş. for the following purposes according to the personal data processing conditions stated above:

### **Your Personal Data will be processed by Tempo Metal Aksesuar Sanayi ve Ticaret A.Ş. for the following purposes**

1. Execution of Information Security Processes, Execution of Employee Benefits and Benefits Processes; Execution of Audit / Ethical Activities; Execution of Access Authorizations; Execution of Corporate Communication
2. Carrying out occupational health and safety activities and fulfilling our legal obligations: Carrying out emergency processes and carrying out emergency operations, creating emergency analysis reports, conducting occupational accident examinations, conducting recruitment examinations, carrying out processes related to obtaining a health report from the workplace physician, if you consent, making position changes according to your detected health status and thus providing you with job positions that are suitable for your health,
3. Execution of human resources policies, payment of wages to employees,
4. Developing performance management systems in line with the objectives set out in the employment contracts with our Company,
5. Improving our human resources processes through exit interview forms that you will fill out upon termination of your employment with Tempo Metal Aksesuar Sanayi ve Ticaret A.Ş., depending on your preference,
6. Making domestic and international assignments when necessary,
7. Creating your personal rights files,
8. Collection of reasons for sickness reports,
9. Managing the power of attorney and signature circular processes to be carried out within the scope of representation and assignment within and outside Tempo Metal Aksesuar Sanayi ve Ticaret A.Ş.,
- 10.Execution of processes regarding the processing of your photographs and images for event management, in-house training, promotion and corporate communication activities, if you consent,
- 11.Conducting training activities, conducting career activities,
- 12.Fulfillment of our administrative and legal obligations,
- 13.Calculation of PACS controlled entry and exit and overtime
- 14.Obtaining legal data taken within the scope of combating epidemics due to public health, public health.

### **What is your personal data processed?**

As an employee, your personal data that may be processed in job application, recruitment and subsequent business processes and their descriptions are as follows;

Identity Information Name-surname, all identification information, nationality, marital status, place and date of birth, Turkish ID number, gender, signature information, SSI number Contact Information Telephone number, telephone number of a substitute person to contact in case of necessity, address, e-mail address Education Information Educational background, information on courses and seminars, foreign language skills, information on trainings and performance during working life, diploma information, curriculum vitae Financial Information Financial and salary details, premium list, enforcement proceedings and debt, alimony information, bank information, minimum living allowance information, Visual Data Photographs, camera footage Auditory Data Sound recordings Sensitive Personal Data Disability status, health reports, health declaration document, health reports, HES code, PCR test, pregnancy

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information, occupational disease records, employment examination form, daily patient complaints, chest X-ray, hearing test, eye examination, blood group information, criminal record, religion section in identity card (old), blood group section in driving license. Sensitive personal data are not processed without explicit consent. Business Life - Labor Data Registration number, position name, department and unit, title, last date of employment, dates of entry and exit, insurance entry/pension, social security number, flexible working hours, travel status, number of working days, projects worked, total monthly overtime information, severance pay base date, severance pay additional days, Leave Data Leave seniority base date, leave seniority additional days, leave group, departure/return date, day, reason for leave, address/phone to be on leave Other Military service status, performance information, family notification information Process Information employee internet access logs, login and logout logs

### **To whom and for what purpose can your processed personal data be transferred?**

According to Article 8 of the LPPD No. 6698 on the transfer of personal data, personal data cannot be transferred without the explicit consent of the data subject.

Personal data; In cases where personal data can be processed without the explicit consent of the personal data owner, it can also be transferred to third parties without explicit consent. Likewise, provided that adequate measures are taken, special categories of personal data other than health and sexual life may be transferred without seeking the explicit consent of the data subject in cases stipulated by law. Personal data relating to health and sexual life can only be transferred for the purposes of protecting 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 authorized institutions and organizations without seeking the explicit consent of the data subject.

The provisions of other laws regarding the transfer of personal data are reserved.

According to Article 9 of the LPPD on the transfer of personal data abroad, as a rule, personal data cannot be transferred abroad without the explicit consent of the data subject. However, personal data may also be transferred to third parties in cases where personal data can be processed without explicit consent. Likewise, provided that adequate measures are taken, sensitive personal data other than health and sexual life may be transferred abroad without seeking the explicit consent of the data subject in cases stipulated by law. Personal data relating to health and sexual life can only be transferred abroad for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, by persons or authorized institutions and organizations under the obligation of confidentiality, without seeking the explicit consent of the person concerned. In the absence of adequate protection, it may be transferred abroad without seeking the explicit consent of the data subject, provided that the data controllers in Türkiye and in the relevant foreign country undertake in writing an adequate protection and the Board has the permission of the Board.

Countries with adequate protection shall be determined and announced by the Board.

The provisions of other laws regarding the transfer of personal data are reserved.

Your personal data processed in accordance with the above-mentioned regulations;

In line with the purposes set out in your employment contract, your personal data may be processed in order to maintain and improve effective employee management, fulfill contractual obligations, evaluate the performance of employees, and ensure occupational safety.

### **Method and Legal Grounds for Collection of Personal Data**

Your personal data is collected partially or completely automatically or as part of any recording system through printed media, electronic media, software, CD, DVD, USB, photocopy, printer, video, camera, phone, tablet, web page. This personal data is collected pursuant to the Labor Law, pursuant to the Occupational Health and Safety legislation, pursuant to the Law on the Regulation of Publications on the Internet and Combating Crimes Committed through These Publications, pursuant to the Law No. 6563 on the Regulation of Electronic Commerce, pursuant to the Turkish Commercial Code, Tax Procedure Law, Turkish Code of Obligations, Turkish Penal Code, Social Insurance and General Health Insurance Law, Personal Data Protection Law No. 6698 and other relevant legislation. Your personal data are collected and processed for the performance of a contract, if stipulated by law, for the fulfillment of a legal obligation, for the legitimate interest of the data controller or for other legal reasons.

### **Transfer of Personal Data**

Your personal data is transferred to our group companies, our occupational health and safety supplier, our lawyer, consultancy firms from which we receive consultancy services, auditing institutions and other suppliers with whom we have a business relationship in accordance with the law in a measured and purposeful manner. Your personal data

may be transferred to law enforcement agencies, courts, public legal entities such as the Personal Data Protection Authority, the Ministry of Finance, the Ministry of Customs and Trade, the Ministry of Labor and Social Security, the Information Technologies and Communication Authority, and public legal entities such as the Personal Data Protection Authority, the Ministry of Finance, the Ministry of Customs and Trade, the Ministry of Labor and Social Security. Your personal data may be transferred to companies that are our business partners abroad or with which we cooperate.

### **Our Obligations Regarding Personal Data Security as Tempo Metal Aksesuar Sanayi ve Ticaret A.Ş.;**

It is obliged to take all necessary technical and administrative measures to ensure the appropriate level of security in order to prevent unlawful processing of personal data, to prevent unlawful access to personal data, and to ensure the preservation of personal data. In the event that personal data is processed by another natural or legal person on its behalf, the data controller is jointly responsible with these persons for taking the measures specified in the first paragraph. The data controller is obliged to carry out or have the necessary audits carried out in its own institution or organization in order to ensure the implementation of the provisions of this Law. Data controllers and data processors cannot disclose the personal data they have learned to anyone else in violation of the provisions of this Law and cannot use them for purposes other than processing. This obligation continues after they leave office. In the event that the processed personal data is obtained by others through unlawful means, the data controller shall notify the relevant person and the Board as soon as possible. If necessary, the Board may announce this situation on its website or by any other method it deems appropriate.

### **What are the Rights of Personal Data Subjects (Data Subject) Pursuant to Article 11 of Law No. 6698?**

- 1.To learn whether personal data about them is being processed,
- 2.To request information if their personal data has been processed,
- 3.To learn the purpose of processing personal data and whether they are used for their intended purpose,
- 4.To know the third parties to whom personal data are transferred domestically or abroad,
- 5.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,
- 6.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 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,
- 7.A person has the right to object to the occurrence of a result to the detriment of the person himself/herself by analyzing the processed data exclusively through automated systems and to demand the compensation of the damage in case of damage due to unlawful processing of personal data.

### **Storage and Destruction Periods and Destruction Methods of Your Personal Data**

Personal data processed in our company are kept for the period stipulated in the relevant legislation. Data, information and documents that no longer need to be preserved are safely destroyed in accordance with our internal legislation and legal regulations. Personal data are kept for the retention periods stipulated within the framework of other secondary regulations in force in accordance with other laws such as Law on the Protection of Personal Data numbered 6698, Turkish Code of Obligations numbered 6098, Social Security and General Health Insurance Law numbered 5510, Law on the Regulation of Publications on the Internet and Combating Crimes Committed through These Publications numbered 5651, Occupational Health and Safety Law numbered 6331, Law on Access to Information numbered 4982, Turkish Criminal Code, Law on the Exercise of the Right to Petition numbered 3071, Labor Law numbered 4857, Regulation on Health and Safety Measures to be Taken in Workplace Buildings and Annexes. Destruction is carried out by recycling paper, clipping, destroying electronic devices, and securely erasing digital data.

### **Communication with the Relevant Person within the Scope of the Law No. 6698 on the Protection of Personal Data**

Requests for the use of the aforementioned rights can be submitted by personal data owners, data subjects by the methods specified in the legislation on the Processing and Protection of Personal Data within the scope of Law No. 6698 on the LPPD page on our company's website. Tempo Metal Aksesuar Sanayi ve Ticaret A.Ş. will evaluate and finalize the requests of the relevant persons as soon as possible and within 30 days at the latest.

You can apply to us through our contact information on our web page for any questions and opinions regarding the use of personal data within the scope of the Law, through the information on our LPDD page. With the explanations we have made above, we have informed you and fulfilled our Disclosure Obligation. As the Data Controller, we will

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respond to you as soon as possible or within the legal periods in accordance with the Law on the Protection of Personal Data numbered 6698.

Please make your application in clear, detailed and appropriate language. You can make your applications in writing via e-mail or our address information.

**Dear Employees,**

**After the termination of your business relationship, you are still responsible for not sharing personal data, protecting and not disclosing personal data that you have previously acquired as part of your duties.**

Protecting the personal data of our customers, suppliers, visitors, guests and colleagues in accordance with the law is also valid in the event of termination of your employment contract. Even if you leave your job, you are obliged to protect the personal data you have previously acquired as a requirement of your job by law and business ethics, otherwise you will be responsible for any material and moral damages that may arise. As Tempo Metal Aksesuar Sanayi ve Ticaret A.Ş., we reserve our legal rights in this regard.

Even if your employment contract ends, as Tempo Metal Aksesuar Sanayi ve Ticaret A.Ş. employees, we reserve the right to use our legal rights in case of problems arising from the confidentiality and security of personal data.

Information on the Information Security Management System is available on our company portal.

You can access our policies and rules regarding LPPD and GDPR on our company portal.

**This Personal Data / Use of Sensitive Personal Data Clarification text has been submitted to you.**

**Identity and Full Address of the Data Controller you will apply to**

**Data Controller Contact Information**

**Data Controller:** Tempo Metal Aksesuar Sanayi ve Ticaret A.Ş.

**Our Address:** Orta Mahalle Topkapı Maltepe Caddesi Silkar Plaza No:6 Kat:2 Bayrampaşa İstanbul

**E-Mail:** [kverilerim@timaytempo.com](mailto:kverilerim@timaytempo.com)

**REM:** [tempometal@hs03.kep.tr](mailto:tempometal@hs03.kep.tr)

**Contact link:** <https://www.timaytempo.com/>