

BMS GEMİ GERİ DÖNÜŞÜM SAN. VE TİC.A.Ş.

DATA PROTECTION DECLARATION

This data protection declaration fulfills the obligation of the data controller BMS GEMİ GERİ DÖNÜŞÜM SAN. VE TİC.A.Ş. referred to as "BMS") to inform according to Article 10 of Act No. 6698 on the Protection of personal data ("KVKK"). Information is provided on the details of the procedures and principles for the processing of personal data and personal data of a special nature as well as on the security measures to protect privacy, fundamental rights and legitimate interests. Although this Law has different aspects, it constitutes the Turkish equivalent of "GDPR" Regulation (EU) 2016/679.

"Processing of personal data" is a legal term and is defined in Law No. 6698 as follows: 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.

As BMS, we attach the utmost importance to the security of your personal data, and we take the highest possible level of security measures to protect your privacy while collecting, storing, processing and, if necessary, sharing your personal data in accordance with the law in all our services we offer to you.

Your personal data that you share with our Company, as Employee, Shareholder/Partner, Manager(Shareholder/Non-Partner), Public Official, Supplier, Product or Service Purchaser, Supplier Official, Company Official, Parent/Guardian/Representative, Public Institution Official, Applicant, Telephone Caller, E-mail Sender (Real Person), E-mail Sender (Legal Entity Employee/Officer), Approver, Ministry Commissioner, Taxpayer, Officer, Sender, Recipient, Declarant, Financial Responsible, Organizer, Exporter, Bank Official, Data Controller Officer, Corporate Customer Representative/Authority, Supplier (Real Person), Supplier Employee, Trainee, Authorized, Potential Product or Service Buyer, Litigation, Enforcement File Party, Potential Product or Service Buyer, Relative to Employee, Employee, Accident-Witness, Doctor, Employee Candidate, Employee Candidate Reference, Legal Counsel, Employer's Deputy, Occupational Health and Safety Specialist, Occupational Physician, Environmental Consultant, Visitor, Auditor, can be processed in connection with our activities and services, transferred, stored to third parties in Turkey and abroad.

Our aim in publishing this data protection declaration is to inform you clearly about the methods your personal data is collected, the purposes for processing, the legal reasons for the processing and your legal rights.

Below you will find the information and concepts that are important for the processing and protection of personal data. The aim is to achieve your full enlightenment with these concepts.

1. Identity Of The Data Controller

In accordance with the provisions of Act No. 6698 ("KVKK"), all information that makes your identity specific or identifiable, including your personal data of a special nature, will be considered personal data and processed by BMS as the data controller, to the extent described below.

2. The Purpose Of Processing Personal Data

According to Article 4 of the KVKK, BMS processes personal data to a limited extent and in proportion to the purpose for which they are processed. In this context, your data may be processed for the following purposes:

- Execution of Goods / Services Sales Processes
- Carrying out Environmental Management Activities
- Execution of Advertising / Campaign / Promotion Operations
- Execution of Marketing Processes of Products / Services
- Execution of Goods / Services After Sales Support Services
- Execution / Supervision of Business Activities
- Execution of Occupational Health / Safety Activities
- Ensuring the commercial, legal or technical security and business continuity of the company and the persons and organizations that are in business relations with the Company,
- Execution of Goods / Services Purchasing Transactions
- Execution of Goods / Services Production and Operation Processes
- Receiving and Evaluating Suggestions for Improvement for Business Processes
- Conducting Audit / Ethical Activities
- Conducting Internal Audit / Investigation / Intelligence Activities
- Execution of Management Activities
- Fulfillment of Employment Contract and legislative Obligations for Employees
- Execution of Employee Benefit and Other Rights Processes
- Execution of Activities in Compliance with the Legislation
- Execution of Finance and Accounting Affairs
- Execution of Legal Affairs
- Providing Information to Authorized Persons, Institutions and Organizations
- Execution of Contract Processes
- Execution of Supply Chain Management Processes
- Planning and Management of Human Resources Processes
- Execution of Emergency Management Processes
- Execution of Risk Management Processes
- Follow-up of Requests / Complaints
- Execution of Communication Activities

- Execution of Customer Relationship Management
- Execution of Logistics Activities
- Ensuring Physical Space Security
- Creating Visitor Records and Tracking
- Ensuring the Security of Movable Property and Resources
- Execution of Assignment Processes
- Execution of Information Security Processes
- Execution of Storage and Archive Activities
- Execution of Activities for Customer Satisfaction
- Execution of Company / Product / Services Loyalty Processes
- Conducting Marketing Analysis Studies
- Execution of Access Authorizations
- Execution of Performance Evaluation Processes
- Execution of Employee Satisfaction and Loyalty Processes
- Execution of Application Processes of Employee Candidates
- Execution of Employee Candidate / Intern / Student Selection and Placement Processes
- Execution of Talent / Career Development Activities
- Execution of Termination Procedures

All necessary technical and administrative measures are taken in order to prevent unlawful processing of your personal data and unlawful access to your data and to protect your personal data securely.

3. Methods And Legal Reason For Collecting Personal Data

Your personal data may be processed using the collection methods listed below;

- Information Technologies Data Recording System
- Computer
- Web Based Software
- E-mail
- Hard Copy
- Original Document
- Form – Document
- Software
- Integration Program
- Word / Excel Files
- Accounting Program
- Encrypted File

Your personal data collected by these methods are processed within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of Law No. 6698.

- i. it is clearly provided for by the laws.
- ii. it is mandatory for the protection of life or physical integrity of the person or of any other person who is bodily incapable of giving his consent or whose consent is not deemed legally valid.
- iii. processing of personal data belonging to the parties of a contract, is necessary provided that it is directly related to the conclusion or fulfilment of that contract.
- iv. it is mandatory for the controller to be able to perform his legal obligations.
- v. the data concerned is made available to the public by the data subject himself.
- vi. data processing is mandatory for the establishment, exercise or protection of any right.
- vii. it is mandatory for the legitimate interests of the controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

If the above-mentioned conditions are not met, personal data cannot be processed without the explicit consent of the data subject.

4. To Whom and For Which Purpose the Processed Personal Data May Be Transferred

Your personal data will be transferred to the following domestic groups;

- Authorized Public Institutions and Organizations
- Natural Persons or Private Legal Entities
- Business Partners
- Suppliers
- Legal / Financial Advisers
- Shareholders
- Product or Service Purchaser

Your personal data will be transferred to the following abroad groups;

- Suppliers
- Natural Persons or Private Legal Entities

Within the framework of the Articles 8 and 9 of the KVKK to fulfill and pursue our economic, financial and legal obligations and to provide services to our corporate customers.

Within the scope of the purposes detailed above, your personal data within our company can only be accessed to the extent required by employees with authorized access to fulfill their duties.

5. According to the regulation in Article 11 of Act No. 6698, Your Rights as Personal Data Owner enumerated in Article 11;

- 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 under the conditions laid down in Article 7,
- g) to request notification of the operations carried out in compliance with sub- paragraphs (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.

If you submit your requests regarding your rights to our company using the methods stated below, our company will finalize the request as soon as possible and within thirty days at the latest, free of charge. However, if the transaction also incurs a cost, the fee in the tariff determined by the Personal Data Protection Board will be charged by our company.

In this context, in accordance with the 1st paragraph of Article 12 of Act No. 6698, you may send a signed copy of the form to the address of Aygaz Cad. No:27 Gemi Söküm Tesisleri Aliağa/İZMİR by filling out the Application Form, which can be accessed on our website (www.bmsgemi.com). You may send it by hand with documents, send it via notary or other methods specified in the KVKK, or send it to the address bmsgemi@hs03.kep.tr with a secure electronic signature.

Detailed information about the processing of your personal data by BMS can be found in the BMS Personal Data Protection and Processing Policy on the www.bmsgemi.com

For your information.

Thank you for reading this data protection declaration.

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