

**VİBROSER SERAMİK İNŞ. SAN.VE TİC. LTD. ŞTİ.**

**PERSONAL DATA PROTECTION AND PROCESSING POLICY**

**Target Group:** All natural persons whose personal data is processed by Vibroser Seramik İnş. San. ve Tic. Ltd. Şti.

**Prepared by:** Vibroser Seramik İnş. San. ve Tic. Ltd. Şti. Personal Data Protection Committee

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**PERSONAL DATA PROTECTION AND PROCESSING POLICY**

**1. INTRODUCTION**

**Vibroser Seramik İnş. San. ve Tic. Ltd. Şti. ("Vibroser")** makes anti-acid and hygienic floor applications resistant to heavy loads and chemicals in many sectors, especially in food, automotive, chemistry, construction market.

Vibroser attaches importance to the protection of personal data in its activities and includes it among its priorities in its business and transactions. Vibroser Personal Data Protection and Processing Policy ("Policy") is the basic regulation for the compliance of the personal data processing procedures and principles determined by the Law on Protection of Personal Data No.6698 ("Law") and Vibroser organization and business processes. In line with this Policy principles, Vibroser processes and protects personal data with its high level of responsibility and awareness and provides the necessary transparency by informing personal data owners.

**1.1. Goal**

The purpose of this Policy is to ensure that the procedures and principles stipulated by the Law and other relevant legislation are harmonized with the Vibroser organization and processes and are effectively implemented in its activities. Vibroser takes severe administrative and technical measures with this Policy for the processing and protection of personal data, creates the necessary internal procedures, increases awareness and provides necessary training to raise awareness. Necessary measures are taken for the compliance of shareholders, officials, employees and business partners with the Law processes, and appropriate and effective control mechanisms are established.

**1.2. Scope**

The policy covers all personal data obtained automatically in Vibroser business processes or non-automated provided that it is part of any data recording system.

**1.3. Basis**

The policy is based on the Law and related legislation. Industrial Registry Law No. 6948, Law No. 4703 on the Preparation and Implementation of Technical Legislation on Products, Law No. 132 on the Establishment of the Turkish Standards Institute (TSE) and the Laws amending this Law, the Environment Law No. 2872 and the current sub-legislation, the Consumer Law No. 6502 Law on the Protection of Identity, the Identity Reporting Law No. 1774, the Labor Law No. 4857, the Occupational Health and Safety Law No. 6331, the Social Insurance and General Health Insurance Law No. 5510, the Unemployment Insurance Law No. 4447, the Turkish Commercial Code No. 6102, the Tax Procedure Law No. 213. Personal data are processed to fulfill legal obligations arising from these and other relevant legislation.

In case of inconsistency between the current legislation and the Policy, the current legislation is applied. The regulations stipulated by the relevant legislation are transformed into Vibroser practices with the Policy.

#### 1.4. Definitions

<b>Express consent</b>	It refers to the consent that is based on information and expressed with free will regarding a specific subject.
<b>Application form</b>	The application form, prepared in accordance with the Personal Data Protection Law No.6698 and the Communiqué on the Procedures and Principles of Application to the Data Controller issued by the Personal Data Protection Authority, containing the application of the personal data subjects regarding the applications to be made to the data controller by the person concerned (Personal Data Owner).
<b>Related user</b>	Except for the person or unit responsible for the technical storage, protection and backup of the data, they are the persons who process personal data within the organization of the data controller or in line with the authorization and instruction received from the data controller.
<b>Destruction</b>	Deletion, destruction or anonymization of personal data.
<b>Record Place</b>	Any medium containing personal data processed in non-automatic ways, provided that it is fully or partially automatic or part of any data recording system.
<b>Personal data</b>	Diverse information regarding an identified or identifiable natural person.
<b>Processing of personal data</b>	Provided that personal data are fully or partially automated or are part of any data recording system: It is all kinds of operations performed on data such as obtaining by non-automatic means, recording, storing, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing use.
<b>Anonymization of personal data</b>	Making personal data unrelated to an identified or identifiable natural person under any circumstances, even by matching other data.
<b>Personal data owner</b>	Natural person whose personal data is processed by or on behalf of Vibroser.
<b>Deletion of personal data</b>	<b>Deletion of personal data is making personal data inaccessible and unavailable in any way for Related Users.</b>
<b>Destruction of personal data</b>	The process of making personal data inaccessible, unrecoverable and reusable in any way.
<b>Committee</b>	Personal Data Protection Board (KVKK)
<b>Corporation</b>	Personal Data Protection Authority.(KVKK)
<b>Sensitive personal data</b>	Individuals' data on their race, ethnicity, political opinion, philosophical belief, religion or other beliefs, appearance, membership of associations, foundations or trade unions, health, sexual life, criminal conviction and security measures, biometric and genetic data.

<b>Periodic destruction</b>	The deletion, destruction or anonymization process specified in the personal data storage and disposal policy and will be carried out ex officio at repetitive intervals in case all of the conditions for processing personal data in the Law are eliminated.
<b>Data Processor</b>	Real and legal person who processes personal data on behalf of the data controller, based on the authority given by them.
<b>Data Record System</b>	A recording system in which personal data are structured and processed according to certain criteria.
<b>Data Owner / Relevant person</b>	The natural person whose personal data is processed.
<b>Data controller</b>	Natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.
<b>Data Representative</b>	In accordance with the law, it is the natural person appointed to fulfill the duties of the Data Controller within the scope of the relevant articles of law.
<b>Regulation</b>	Regulation on Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette on October 28, 2017

## **2. PROTECTION OF PERSONAL DATA**

### ***2.1. Ensuring the Security of Personal Data***

Vibroser takes the necessary measures stipulated in Article 12 of the Law, according to the nature of the personal data, in order to prevent unlawful disclosure, access, transfer or security problems of personal data that may occur in other ways. Vibroser takes precautions including inspections to ensure the required level of personal data security in accordance with the guidelines published by the Personal Data Protection Authority.

### ***2.2. Protection of Sensitive Personal Data***

Sensitive data on person's race, ethnicity, political opinion, philosophical belief, religion or other beliefs, appearance, membership of associations, foundations or trade unions, health, sexual life, criminal conviction and security measures, biometric and genetic data are carefully implemented with measures open to careful and necessary inspections..

### ***2.3. Improving Awareness of Protection and Processing of Personal Data***

Vibroser provides necessary training to those concerned in order to develop the awareness of processing and accessing personal data in accordance with the law, preserving data and exercising rights.

In order to increase the awareness of employees to protect personal data, Vibroser creates the necessary business processes and receives support from consultants when needed. The shortcomings encountered in practice and the results of the training are evaluated by Vibroser management. New training are organized in case of need due to the changes in the legislation regarding these evaluations.

### 3. PROCESSING OF PERSONAL DATA

#### 3.1. Processing of Personal Data in Compliance with Legislation

Personal data are processed in accordance with the legislation in line with the principles listed below.

- i. Processing in accordance with the Law and the Rules of Honesty*  
Personal data are processed to the extent required by business processes, limited to these, without harming the fundamental rights and freedoms of individuals, and in accordance with the law and the rule of honesty.
- ii. Keeping Personal Data Current and Accurate*  
Necessary measures are taken to keep the processed personal data up-to-date and accurate, and they work in a planned and scheduled manner.
- iii. Processing for Specific, Clear and Legitimate Purposes*  
Personal data are processed depending on the legitimate purposes determined and explained in the business processes carried out.
- iv. Being Related, Limited and Measured for the Purpose of Processing*  
Personal data are collected in the nature and extent required by business processes and processed in a limited way depending on the determined purposes.
- v. Keeping it for the required period*  
Personal data are kept for at least the period stipulated in the relevant legislation and required for the purpose of processing personal data. First, if a period of time is stipulated in the relevant legislation for the storage of personal data, if not, personal data are stored for the period required for the purpose for which they are processed. At the end of the retention periods, personal data are destroyed by appropriate methods (deletion, destruction or anonymization) in accordance with the periodic destruction periods or data owner application.

#### 3.2. Conditions of Processing Personal Data

Personal data is processed on the basis of the explicit consent of the owner or one or more of the other conditions specified below.

- i. Obtaining the Explicit Consent of the Personal Data Owner*  
The processing of personal data is done with the explicit consent of the data owner. Explicit consent of the personal data owner: It is realized by being informed on a specific subject and by obtaining their free will.
- ii. No Explicit Consent of Personal Data Owner*  
If any of the conditions listed below are met, personal data can be processed without the explicit consent of the data owner.
  - a. Clear Regulation in Laws*  
If there is a clear regulation regarding the processing of personal data in the laws, personal data can be processed without the consent of the data owner.
  - b. Failure to Obtain Explicit Consent of the Relevant Person Due to Actual Impossibility*  
The personal data of the data subject may be processed in case the personal data of the person who is unable to disclose his / her consent or whose consent cannot be given validity due to the actual impossibility, in order to protect the life or body integrity of themselves or another person.
  - c. Directly Related to the Establishment or Execution of the Contract*  
If the processing of personal data is directly related to the establishment or execution of a contract to which the data owner is a party, the personal data of the data owner may be processed.

**d. Fulfilling Legal Obligation**

While Vibroser fulfills its legal obligations, personal data of the data owner may be processed if personal data processing is mandatory.

**e. Making Personal Data Public by Personal Data Owner**

Personal data belonging to data owners who publicize their personal data may be processed, limited to the purpose of publicizing their personal data.

**f. Mandatory Data Processing for the Establishment or Protection of a Right**

If data processing is necessary for the establishment, use or protection of a right, the personal data of the data owner may be processed.

**g. Mandatory Data Processing for Legitimate Interest**

Provided that the fundamental rights and freedoms of the personal data owner are not breached, the personal data of the data owner may be processed if data processing is necessary for the legitimate interests of Vibroser.

**3.3. Processing Sensitive Personal Data**

Vibroser processes sensitive personal data in accordance with the principles specified in the Law and Policy, taking necessary administrative and technical measures with the methods determined by the Board, and with the following procedures and principles:

- i. Sensitive personal data other than health and sexual life**, can be processed without the explicit consent of the data owner, if there is an explicit provision in the law regarding its processing. In cases not explicitly stipulated in the laws, the explicit consent of the data owner is obtained.
- ii. Sensitive personal data related to health and sexual life**, can be processed by persons under the obligation of confidentiality or authorized institutions and organizations: for the purpose of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and managing health services and financing, without the explicit consent of the data subject. Otherwise, the explicit consent of the data owner is obtained.

**3.4. Informing the Personal Data Owner**

Vibroser informs the personal data owners about the purposes for which their personal data is processed, with whom they are shared with what purposes, with which methods they are collected, the legal reason and about the rights of data owners in processing their personal data in accordance with the relevant legislation. In this respect, the protection of personal data is carried out in accordance with other policy documents and clarification texts prepared within the framework of the principles in the Policy.

**3.5 Transfer of Personal Data**

Vibroser may transfer personal data and sensitive personal data to third parties (third party companies, group companies, third natural persons) in accordance with the law by taking the necessary security measures in line with personal data processing purposes. Vibroser performs transfer operations in accordance with the regulations stipulated in Article 8 of the Law.

**i. Transfer of Personal Data**

Although the explicit consent of the personal data owner is sought for the transfer of personal data, personal data can be transferred to third parties by taking necessary security measures, including the methods stipulated by the Board, based on one or more of the following conditions.

- a.** If it is clearly stipulated by the laws ,

- b.* If it is directly related and necessary with the establishment or execution of a contract,
- c.* In case Vibroser is obliged to fulfill its legal obligation,
- d.* Limited for the purpose of making the personal data public by the data owner,
- e.* In case it is mandatory for the establishment, use or protection of the rights of the Vibroser or the data owner or third parties,
- f.* In case it is necessary to ensure the legitimate interests of Vibroser, provided that it does not harm the fundamental rights and freedoms of the data owner,
- g.* It is obligatory for the person who is unable to give their consent due to actual impossibility or whose consent is not legally valid, to protect themselves or someone else's life or physical integrity.

Personal data related to any of the above-mentioned situations may be transferred to those who have the status of "**Foreign Country with Sufficient Protection**" who are determined to have sufficient protection by the Board and declared as such. Personal data may be transferred to the countries that don't have adequate protection but do have the protection guaranteed in writing by the data controllers in Turkey or in foreign countries, and in the status of "**Countries with a Data Supervisor Guaranteeing Adequate Protection**" with the Board's permission. This process is done in accordance with the conditions stipulated in the legislation.

#### *ii. Transfer of Sensitive Personal Data*

Sensitive personal data can be transferred under the following conditions by taking necessary administrative and technical measures, including the methods to be determined by the Board, in accordance with the principles set out in the Policy:

- a. Sensitive personal data other than health and sexual life,* If there is an explicit provision in the laws regarding the processing of personal data, it may be transferred without the explicit consent of the data owner. Otherwise, it can be transferred if the explicit consent of the data owner is obtained.
- b. Sensitive personal data related to health and sexual life,* For the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, It can be transferred by persons under confidentiality obligation, or authorized institutions and organizations, without seeking explicit consent. Otherwise, it can be transferred if the explicit consent of the data owner is obtained.

Personal data can be transferred to those who are in the status of "Foreign Country with Adequate Protection", if any of the above conditions are met. In the absence of sufficient protection, personal data can be transferred to those in the status of "Foreign Country with Adequate Protection of Data Controller" according to the data transfer conditions regulated in the legislation.

#### **4. PERSONAL DATA INVENTORY PARAMETERS**

Vibroser general manager, financial affairs (finance), human resources and administrative affairs, sales and marketing, warehouse, purchasing, exporting, information processing, R&D business processes, employee candidate, employee, shareholder / partner, potential product or service buyer, Data categories and personal data belonging to the personal data ownership (Annex-1), consisting of the supplier employee / supplier officer, persons purchasing products or services, parents / guardians / representatives, visitors, family members and relatives (Annex-1), depends on the purposes of personal data processing (Annex-2) is being processed. For the purposes of processing according to the data categories, the details of the data subject person groups are reported in the Vibroser section at <https://verbis.kvkk.gov.tr/>.

The purposes of processing personal data are based on at least one of the personal data processing conditions specified in Articles 5 and 6 of the Law, and limited to the Law on the processing of personal data. It is processed according to the objectives determined in order to realize in accordance

with the general principles specified in the Law, especially the principles specified in Article 4 of the Law.

Personal data Policy “3.5. With the principles set out in the section “Transferring Personal Data”: Natural or private law legal entities, shareholders, suppliers, authorized public institutions and organizations, private insurance companies, contracted services, organizations we cooperate with, for the purposes (Annex-3) data transfer to foreign countries is not possible.

## **5. MEASURES TAKEN FOR THE PROTECTION OF PERSONAL DATA**

Vibroser takes the necessary technical and administrative measures to protect the personal data it processes in accordance with the procedures and principles specified in the Law, it also makes the necessary audits, raises awareness and carries out training activities.

Despite all technical and administrative measures taken, Vibroser informs the relevant persons and units as soon as possible in the event that the processed personal data is illegally seized by third parties.

## **6. STORAGE AND DISPOSAL OF PERSONAL DATA**

Vibroser, first of all, if a period of time is determined in the relevant legislation, in accordance with this period; If a legal period is not determined it stores the personal data for the period required for the purpose of processing the personal data. Personal data is destroyed at the end of the specified storage periods, in accordance with the periodic destruction periods or the data owner application, by the specified method (deletion, destruction or anonymization).

## **7. RIGHTS OF PERSONAL DATA OWNERS AND THE USE OF THESE RIGHTS**

### ***7.1. Rights of Personal Data Owner***

Personal data owners have the following rights arising from the Law:

- i.** Learning whether personal data is processed,
- ii.** If personal data has been processed, to request information regarding this,
- iii.** Learning the purpose of processing personal data and whether they are used in accordance with their purpose,
- iv.** To know the third parties to whom personal data are transferred domestically or abroad,
- v.** 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 are transferred,
- vi.** Although it has been processed in accordance with the provisions of the law and other relevant laws, they have the right to request the deletion or destruction of personal data in the event that the reasons for its processing disappear and have the right to notify the third parties to whom the personal data has been transferred.

- vii. To object to the occurrence of a result against the person himself by analyzing the processed data exclusively through automated systems,
- viii. To demand the compensation of the damage in case of damage due to the processing of personal data illegally.

### ***7.2. Personal Data Owner Exercising Their Rights***

Personal data owners may submit their requests regarding the rights listed in Article 6.1 to Vibroser by the methods determined by the Board. Personal data owners and those who have the right to apply on their behalf can apply to Vibroser by filling out the "**Personal Data Owner Application Form**" (Annex-4).

### ***7.3. Vibroser's Response to Applications***

Vibroser finalizes the applications made by the personal data owner in accordance with the Law and other legislation. Requests duly forwarded to Vibroser are concluded free of charge as soon as possible and within 30 (thirty) days at the latest. However, if the transaction requires additional cost, a fee may be charged in accordance with the tariff determined by the Board.

### ***7.4. Rejection of Personal Data Owner's Application***

Vibroser may reject the request of the applicant by explaining its justification in the following cases:

- i. Processing personal data for purposes such as research, planning and statistics by making them anonymous with official statistics,
- ii. Processing of personal data for artistic, historical, literary 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 of private life or personal rights or constitute a crime,
- iii. Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order or economic security,
- iv. Processing of personal data by judicial authorities or execution authorities in relation to investigation, prosecution, trial or execution,
- v. Processing of personal data is necessary for the prevention of crime or for criminal investigation,
- vi. Processing of personal data made public by the personal data owner,
- vii. Processing of personal data is necessary for the execution of supervision or regulation duties and for disciplinary investigation or prosecution by authorized and authorized public institutions and organizations and professional organizations that have the quality of public institutions, based on the authority granted by law,
- viii. Processing of personal data is necessary for the protection of the economic and financial interests of the State regarding budget, tax and financial issues,,
- ix. The possibility of the personal data subject's request to hinder the rights and freedoms of other persons,
- x. Requests requiring disproportionate effort have been made,
- xi. The information requested is public information.

### ***7.5. Complaint Right of Personal Data Owner to KVK Board***

In case the application is rejected in accordance with Article 14 of the Law, the response is found to be insufficient or the application is not answered in time; Vibroser can file a complaint to the Board within thirty days from the date of learning the answer, and in any case within sixty days from the date of application.

### ***7.6. Information that may be requested from the Personal Data Owner Applying***

Vibroser may request information from the relevant person in order to determine whether the applicant is the owner of personal data. In order to clarify the matters included in the application of the personal data owner, Vibroser may ask a question to the personal data owner about their application.

## **8. EXECUTION**

The policy has been approved and put into effect by the Board of Directors. The technical execution of the policy is provided by the "Personal Data Storage and Destruction Policy" (Annex-5).

In business processes, the execution of the policy under the supervision of the parties is carried out with "Customer Clarification Text and Explicit Consent Statement" (Annex-6), "Supplier Confidentiality Statement, Disclosure Text and Explicit Consent Statement" (Annex-7) "Employee Disclosure Text and Explicit Consent Statement" (Annex-6) -8), "Employee Candidate Clarification Text and Explicit Consent Statement" (Annex-9), "Website Cookie Clarification Text" (Annex-10), "Camera Recording Systems Lighting Text" (Annex-11), Carrying Illumination Text and It is carried out with an Explicit Consent Statement (Annex-12).

The Board is responsible for the execution and updating of the Law and Policy when necessary, and the Vibroser Personal Data Protection Committee is responsible for the follow-up, coordination and control of all work and transactions within this scope.

## **9. ENFORCEMENT and ANNOUNCEMENT**

The policy has entered into force as of its publication. Changes to the policy are published on the website of Vibroser ([www.vibroser.com](http://www.vibroser.com)) and made available to personal data owners and relevant persons. Policy changes come into effect on the date they are announced.

### **ANNEXES**

**Annex 1- Data Categories and Personal Data**

**Annex 2- Purposes of Processing Personal Data**

**Annex 3- Persons to whom Personal Data are Transferred and Transfer Purposes**

**Annex 4- Personal Data Owner Application Form**

**Annex 5- Personal Data Storage and Destruction Policy**

**Annex 6- Customer Information Text and Explicit Consent Statement**

**Annex 7- Supplier Confidentiality Declaration, Clarification Text and Explicit Consent Statement**

**Annex 8- Employee Clarification Text and Explicit Consent Statement**

**Annex 9- Employee Candidate Clarification Text and Explicit Consent Statement**

**Annex 10- Website Cookie Clarification Text**

**Annex 11- Clarification Text for Camera Recording Systems**

**Annex 12- Carrying Agent Clarification Text and Explicit Consent Statement**

## ANNEX 1- Data Categories and Personal Data

<b>Data Categories</b>	<b>Personal Data</b>
<b>ID</b>	Name Surname
	Mother-Father Name
	Date of birth
	Place of birth
	Marital Status
	Identity Card Serial Number
	National ID number
	Passport number
	Temporary National ID Number
	Gender Information
	National ID Card
	Driver's license
	<b>Contact</b>
E-mail address	
Contact info	
Registered Electronic Mail Address	
Phone number	
<b>Personnel Information</b>	Payroll Information
	Disciplinary Proceeding
	Job Entry-Exit Document Records
	Resume Information
	Performance Evaluation Reports
Militray Service Information	
<b>Legal Action</b>	Information in correspondence with judicial authorities, information in the case file, etc.
<b>Customer Transaction</b>	Invoice
	Bill
	Check Information
	Information on Entry Receipts
	Order Information
	Request Information
<b>Physical Space Security</b>	Camera Recordings
<b>Process Security</b>	IP Address Information
	Website Entry and Exit Information
	Password Information
<b>Risk Management</b>	Information processed to manage commercial, technical and administrative risks
<b>Finance</b>	Balance Sheet Information
	Financial Performance Information
	Credit and Risk Information
	Asset Information
	Bank Account Number
	IBAN number

<b>Professional Experience</b>	Diploma Information
	Courses Attended
	In-service Training Information
	Certificates
<b>Marketing</b>	Shopping History Information
	Survey
	Cookie Records
	Information Obtained Through the Campaign Work
<b>Audiovisual Records</b>	Closed Circuit Camera Monitoring System Image, Sound Recording, photography
<b>Dress</b>	Information on dress
<b>Health Information</b>	Information on Disability Status
	Blood Type Information
	Personal Health Information
	Used Device and Prosthesis Information
	Laboratory and XRay Results
	Test Results
	Inspection Data
Prescription Information	
<b>Criminal Convictions and Security Measures</b>	Information on Criminal Convictions
	Information on Security Measure
<b>Family Information</b>	Number of children
	Family registry
	Spouse's Working Information
	Child Education and Age Information
	Birth and Death Certificate
<b>Working Data</b>	Department
	Mode of Operation
	Job
	References
	Profession Card Information
<b>Website Usage Data</b>	Application Form Filling Date
	Offers Received or Not Received
	Date of Membership
	Frequency / Times of Login to the Site
	Last Login Date
	IP Address
	Browser Information
	Medical Documents Transmitted
Location Data	
<b>Request / Complaint Management Information</b>	Survey Data
	Personal data regarding the receipt and evaluation of any request or complaint directed to the company.
<b>Reputation Management Knowledge</b>	Information collected for the purpose of protecting the commercial reputation of the company and the evaluation reports created and information about the actions taken.
<b>Incident Management Information</b>	Personal data processed to take necessary legal, technical and administrative measures against events that develop in order to

	protect the commercial rights and interests of the company and the rights and interests of its customers.
<b>Signatures</b>	Wet ink or electronic signature, fingerprints, special marks on documents that qualify as personal data
<b>Insurance</b>	Private Insurance Data
	Social Security Institution Data
<b>Vehicle</b>	License Plate Data
<b>Compliance Information</b>	Personal data processed within the scope of compliance with policies
<b>Audit and Inspection Information</b>	Personal data processed during internal or external audit activities
<b>Residence Permit Information for Foreigners</b>	Information on Residence Permit for Foreigners

## ANNEX 2- Categorical Personal Data Processing Purposes

Execution of Emergency Management Processes
Execution of Information Security Processes
Execution of Employee Candidate / Intern / Student Selection and Placement Processes
Execution of Employee Candidates' Application Processes
Employee Contract and Fulfillment of Obligations Arising from Legislation
Execution of Fringe Benefits and Benefits Processes for Employees
Making Audit / Conducting Ethical Activities
Conducting Training Activities
Execution of Access Rights
Conducting Activities in Compliance with Legislation
Execution of Finance and Accounting Affairs
Execution of Loyalty Processes to Company / Products / Services
Ensuring Physical Space Security
Execution of Assignment Processes
Follow-up and Execution of Legal Affairs
Making Internal Audit / Conducting Investigation and Intelligence Activities
Conducting Communication Activities
Planning of Human Resources Processes
Execution / Supervision of Business Activities
Conducting Occupational Health / Safety Activities
Receiving and Evaluating Suggestions for the Improvement of Business Processes
Conducting Business Continuity Activities
Execution of Logistics Activities
Execution of Goods / Service Purchase Processes
Execution of Goods / Service After Sales Support Services
Execution of Goods / Service Sales Processes
Execution of Customer Relationship Management Processes
Conducting Activities for Customer Satisfaction
Organization and Event Management
Conducting Marketing Analysis Studies
Execution of Performance Evaluation Processes

Execution of Advertising / Campaign / Promotion Processes
Execution of Risk Management Processes
Execution of Storage and Archive Activities
Execution of Contract Processes
Tracking of Requests / Complaints
Ensuring Security Of Movable Goods And Resources
Execution of Supply Chain Management Processes
Execution of Wage Policy
Execution of Marketing Process of Products / Services
Ensuring the Security of Data Supervisor Operations
Foreign Personnel Work and Residence Permit Procedures
Execution of Investment Processes
Conducting Talent / Career Development Activities
Informing Authorized Persons, Institutions and Organizations
Conducting Management Activities

### ANNEX 3 - Persons to whom Personal Data are Transferred and Transfer Purposes

Vibroser employee candidate, employee, shareholder / partner, potential product or service buyer, supplier employee / supplier officer, person purchasing product or service, parent / guardian / representative, visitor and family member in accordance with Articles 8 and 9 of the Law, and can transfer the personal data of their relatives to the categories of persons listed below.

<b>Persons for Data Transfer</b>	<b>Definition</b>	<b>Data Transfer Purpose and Scope</b>
<b>Natural or Private Law Legal Entities</b>	Natural persons or legal entities with whom the vibroser is in contact and transacted with its activities	Limited to the work and transaction performed
<b>Shareholders / Business Partners</b>	Natural persons that have a partnership relationship with Vibroser	Limited for the planning, execution and control of strategies related to the commercial activities of Vibroser
<b>Legally Authorized Public Institutions and Organizations</b>	Social Security Institution, Tax Offices etc. Public institutions and organizations authorized to receive information and documents from Vibroser in accordance with the provisions of the relevant legislation	Limited to the purpose requested by the relevant public institutions and organizations based on their legal authority
<b>Contracted service providers and cooperating organizations</b>	Institutions or organizations from which contracted services are obtained, cooperated, established in accordance with certain conditions in accordance with the provisions of the relevant legislation and continue their activities within this framework	Contract and cooperation are limited to the principles of the protocol and the subjects that fall within their field of activity.

<b>Suppliers</b>	Parties providing services to Vibroser in line with data processing purposes and requests	Limited in order to supply goods and services to fulfill the commercial activities of Vibroser from an external source.
<b>Private Insurance Companies</b>	Contracted BES (Individual Pension System) Company	Limited to the notification made within the scope of BES