

THE COMPANY'S DECLARATION ON PROCESSING OF PERSONAL DATA

We, at Bemas Metal San. Ve Tic. A.Ş. (“Bemas Metal”) have written the following declaration on how we process, store and transfer/share your personal data during our operations and activities in compliance with the Personal Data Protection Law no 6698 ("KVKK") any other relevant law and regulation in order to inform our Visitors, Online Visitors, Customers, Employees of our Suppliers and Authorized Representatives of our Suppliers.

1) What are the Personal Data Categories We Process and for What Purposes We Propose Them?

Your personal data is processed by Bemas Metal San. Ve Tic. A.Ş. for the below mentioned purposes:

- (i) To comply with laws and to be in good faith,
 - (ii) To be up-to-date and correct as necessary,
 - (ii) To process with certain, clear and legitimate purposes,
 - (iv) To be related with and limited to the purpose of processing,
 - (v) To store and save data for the duration necessary for the purpose of processing or as stipulated in the relevant law
- during our business relations which we have established and ongoing with our business partners (*one person can be in more than one category*) as listed below

A. Our Visitors

Identity information (e.g. name, surname), physical location security information (e.g. security camera footage) of our visitors;

- a) are processed to create a registry of visitors and follow visitors,
- b) and to ensure physical location security.

B. Online Visitors

Process security information (e.g. IP address information) of online visitors using our website and identity information (*should you have provided such information to us*) and contact information (e.g. e-mail address) of online visitors of our website will be processed;

- a) to conduct our operations in compliance with the law,
- b) to manage information security processes,
- c) to process requests/complaints,
- d) to manage communication activities,
- e) to notify authorities,
- f) to ensure access to our website.

C. Our Customers

Identity information, contact information, customer transaction information (e.g. order information), physical location security information, financial information, legal transaction information and marketing information (e.g. shopping history) of our real person customers or authorized representatives and/or employees of our legal person customers are processed:

- a) to work and perform our activities in compliance with the law,
- b) to provide financial and accounting services,
- c) to manage/control business operations,
- d) to conduct logistic operations,
- e) to provide after sale services,
- f) to manage sales processes of goods/services,
- g) to perform marketing analyses,
- h) to manage agreement processes,
- i) to notify authorities,
- j) to ensure physical location security,
- k) to solve legal disputes,
- l) to manage storage and archive operations,
- m) to run risk management processes,
- n) to manage company/product/service loyalty processes,
- o) to manage communication activities.

D. Employees of Our Suppliers

Identity information, contact information, physical location security information, professional experience information (e.g. on the job training information) of our suppliers is processed:

- a) to manage communication activities,
- b) to manage/control business operations,
- c) to ensure physical location security,
- d) to run supply chain management processes,
- e) to conduct logistic operations,
- f) to work and perform our activities in compliance with the law,
- g) to perform occupational health and safety activities,

E. Authorized Representatives of Our Suppliers

Identity information, contact information, physical location security information, customer transaction information, financial information, marketing information, legal transaction information of our real person suppliers or authorized representatives and/or employees of our legal person suppliers are processed:

- a) to manage/control business operations,
- b) to manage procurement of goods and services processes,
- c) to provide financial and accounting services,
- d) to manage agreement processes,

- e) to manage investment processes,
- f) to ensure physical location security,
- g) to manage and follow legal operations.

2) What are the Methods Used to Collect Your Personal Data?

Your personal information which is categorized as described above is collected by automatic or non-automatic means through order forms, agreements/contracts, visitor forms or via information systems and electronic devices (*e.g. telecommunication infrastructure, computers and smart phones*), via third parties (*e.g. KBB and Findeks*), our website and other documents provided by the data subject.

3) What is the Legal Basis to Collect Your Personal Data?

Your personal data is processed by Bemas Metal San. Ve Tic. A.Ş. for the above mentioned purposes in the following situations in compliance with the article 5 of the KVKK:

- (i) When explicitly stipulated in law,
- (ii) Data processing is required provided that this is directly related with the establishment or execution of an agreement;
- (iii) Data processing must be done in order for us as the data controller to fulfil our legal obligations;
- (iv) Data processing must be done in order to establish, exercise or protect a right,
- (v) Data processing must be done for the legitimate interests of the Data Controller provided that no harm is inflicted on the basic rights and freedom of the data subject.

If your personal data is to be processed for reasons other than the above mentioned legal reasons, your explicit consent will be sought.

4) Do We Transfer Your Personal Data to Third Parties?

a) **Personal data of our visitors** may be shared with law enforcement officers and legal authorities to solve legal disputes and if it is required pursuant to the relevant law.

b) **Personal data of our online visitors** may be shared with law enforcement officers and other authorities to solve legal disputes and if it is required pursuant to relevant law.

c) **Personal data of our customers** are shared with authorized people and organizations in order to conduct our operations in compliance with relevant regulations, to follow and manage our legal work, to report and notify authorized people and organizations and to our suppliers, cargo/logistics companies, insurance companies, banks and our financial consultants to manage/control our business activities, to run our risk management processes and to perform the services as required. Additionally personal data may be transferred to/shared with our law firm and relevant authorities in order to be used as evidence in legal disputes that may arise in the future.

d) **Personal data of employees of our suppliers** are shared with authorized people and organizations in order to conduct our operations in compliance with relevant regulations, to follow and manage our legal work, to report and notify authorized people and organizations,

to manage/control our business activities and to our suppliers, banks and our financial consultants to perform the services to the extent necessary. Additionally personal data may be transferred to/shared with our law firm and relevant authorities in order to be used as evidence in legal disputes that may arise in the future.

e) **Personal data of the authorized representatives of our suppliers** are shared with authorized people and organizations in order to conduct our operations in compliance with relevant regulations, to follow and manage our legal work, to report and notify authorized people and organizations, to manage/control our business activities and to our suppliers, cargo companies, banks and our financial consultants to perform the services to the extent necessary. Additionally personal data may be transferred to/shared with our law firm and relevant authorities in order to be used as evidence in legal disputes that may arise in the future.

5) Do We Transfer Your Personal Data to Abroad?

Bemas Metal San. Ve Tic. A.Ş. does not transfer your personal data to abroad.

6) How can you Exercise Your Rights About Your Personal Data?

Pursuant to the article 11 of the KVKK regulating the rights of the data subject, you can send your requests using the "Application Form to Data Controller" on the website <http://www.bemasmetal.com/> of Bemas Metal San. Ve Tic. A.Ş., which was developed in accordance with the "Communiqué on the Procedures and Principles of the Application to Data Controller" .

Data Controller: Bemas Metal San. Ve Tic. A.Ş.

Address: Demirciler Köyü M.O.S.B. 8. Sk. No:1 Dilovası/Kocaeli

Mail: kvkk@bemasmetal.com