

GÜBRE FABRİKALARI TÜRK AŞ

PRIVACY POLICY IN ACCORDANCE WITH THE LAW NO 6698 ON THE PROTECTION OF

PERSONAL DATA

Gübre Fabrikalari Türk Anonim Şirketi ("GÜBRETAS") is committed to protecting the privacy rights of our customers and all visitors in accordance with the Law numbered 6698 on Protection of Personal Data ("KVKK"). Where this policy refers to "we", "our" or "us" below, unless it mentions otherwise, it's referring to the company GÜBRETAS that is the controller of your personal information. This Privacy Policy contains details about the categories and legal grounds of processed personal data, personal data to be transferred and data subject rights under KVKK and GDPR.

DATA CONTROLLER:

GÜBRETAS

Mersis Number : 0412000447700010

Internet Address : www.gubretas.com.tr

Telephone Number : +90 216 468 50 50

E-mail : gubretas@gubretas.com.tr

Address : Nida Kule Göztepe İş Merkezi Merdivenköy Mah. Bora Sk. No:1
Kat:12-30-31 34732 Kadıköy/Istanbul/TURKEY

PURPOSES OF PROCESSING PERSONAL DATA

We, GÜBRETAS as the data controller, process your personal data under the provisions of Articles 5 and 6 of KVKK on the purposes of the following:

- To improve, enhance and vary our products and services, and to offer alternative services to real/legal entities whom we are in a commercial relationship with,

- To coordinate and carry out business areas, to determine the needs of our customers and employees, to fulfill the obligations arising from the contract, to implement and pursue advertising and marketing operations, to follow-up customer relationship and to ensure that appropriate security measures are taken,
- To improve and enhance our service standards,
- To specify and implement our commercial business strategies,
- For the full performance of our obligations of arising out of the contracts,
- To ensure the legal certainty of the real/legal entities who we are in a commercial relationship with,
- To organize commercial books, bills, bank checks and payrolls which are issued by GÜBRETAŞ as per the legislation,
- To ensure the safety of employees, guests and buildings of GÜBRETAŞ,
- To evaluate the recruitment processes of employee candidates, to create employee personal files and to maintain GÜBRETAŞ's human resources policies,
- To increase the morale and motivation, performance level and satisfaction of the employees of GÜBRETAŞ,
- To provide access to internet to the guests in public areas of GÜBRETAŞ,
- To generate statistical data, to record visitor information and to obtain feedbacks in case of visiting our website,
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To audit the existence of required quality and standards, and/or to fulfill our obligations stipulated under the law and relevant regulations,

- To plan business trips of employees,
- In order to plan logistics activities,
- To ensure the establishment of business relations,
- To fulfill us after sales obligations,

- To improve, enhance and diversify our products and services, and to offer alternatives to natural and legal people with whom we are in a commercial relationship,
- To establish and implement GÜBRETAŞ's short-term and long-term strategic plans its commercial objectives,
- For the purpose of using the personal data of the stakeholders, officers and employees of the corporate customers, to be used by them, in the management of customer relations, in the corporate business planning and follow-up processes,
- To prepare various reports, research and presentations, to plan emergency management processes, to follow-up finance and accounting works, to provide security for our company,
- For the purpose of carrying out the events, meetings, conferences,
- In order to follow-up, finalize and give feedback the requests, complaints and suggestions submitted to us,

TRANSFER OF PERSONAL DATA

As part of the purposes above, pursuant to the Article 8 and 9 of the Law numbered 6698, we may transfer your personal data:

- To our overseas and domestic business partners, affiliates in order to conduct our business and to ensure sustainability of our services,

- To our suppliers and sub-contractors in order to provide products and services to our customers,
- To public institutions and organizations, in order to fulfill the legal obligations stipulated in the legislation,
- To other private and public legal entities, including overseas and domestic banks and financial organizations in order to ensure our employees' social and financial rights,
- To legally authorized public institutions and organizations and to judicial bodies with the limits of the requested data by the competent authority in accordance with the Law,
- To GÜBRETAŞ's subsidiaries in order to create a common database and to carry out coordination and cooperation,
- To GÜBRETAŞ's subsidiaries, to determine the needs of our customers and
- employees, to fulfill the obligations required for the contract, to maintain advertising and marketing activities, to ensure customer follow-up, to ensure occupational health and safety and business continuity,
- To domestic and overseas software houses, in order to create databases of the operating systems and computer programs used by our company and to ensure operation and maintenance and repair of the program thereto,
- To domestic and overseas technology companies from whom we provide cloud services,
- To GÜBRETAŞ's partners, service providers, and vendors of all other domestic and international affiliated companies of GÜBRETAŞ for customer tracking and to meet customer needs,

- To the other companies which we are provided services to perform cultural and social events, conferences etc.,

To provide food, gifts, promotions and similar services to the employees of us,

- To human resources companies and other affiliated companies for the purpose of establishing and conducting human resources policies,
- In order to make our employees of our company benefit from private health insurance and supplementary health insurance services,
- To tourism companies, hotels and organization companies, airline companies, for accommodation, transportation and touristic purposes,
- In order to ensure the delivery of products and services to the subsidiaries of GÜBRETAŞ,
- To banks, financial institutions and other companies that request a reference based on a valid legal reason,
- To the contacted domestic and overseas companies in order to ensure logistic activities,
- In order to ensure the safety of the workplace, to security companies with expertise in financial, managerial and human resources consultancy firms, in order to create marketing strategies, to develop new business areas, to increase our quality standards and to reduce costs.

METHOD AND LEGITIMATE REASON OF COLLECTING PERSONAL DATA

Your personal data is collected by GÜBRETAŞ or in the name of GÜBRETAŞ via declaration, application forms, forms filled out from the web site, documents requested for creating personal file, various contracts, all kinds of information forms, surveys, image and sound recorder devices, web-based or mobile applications, job application forms, oral, written or electronic channels through call centers according to your explicit consent or personal data processing requirements as prescribed by law.

We collect such personal data for the purpose of conducting our commercial and administrative activities duly and to provide our services complete and accurate pursuant to the duties arising from the Law.

RIGHTS OF THE DATA SUBJECT UNDER KVKK

Any individual whose personal data is being collected, held or processed by GÜBRETAŞ have the following rights in accordance with Article 11 of the KVKK:

- To learn whether personal data is processed,
- Request personal information if personal data is processed,
- To learn the purpose of processing of personal data and whether such data is used appropriately
- Third parties, recipients and recipient categories which personal data is transferred to or to be transferred at home or abroad,
- To request for correction of personal data in case of incomplete or incorrect processing of such data and notifications to the relevant third parties thereto,
- To request the erasure or destruction of personal data in case the legitimate reasons for processing have been eliminated despite the said data being processed in accordance with the provisions of the KVKK and the relevant legislation, thus request to serve notification to the relevant third parties regarding processing activities are ceased,
- To object to the emergence of a result against the individual by analyzing the processed data exclusively through automated systems, to demand an indemnification in case there is a loss due to personal data being processed contrary to the law.

You can submit your requests related to these rights to our company GÜBRETAŞ registered at *Nida Kule Göztepe İş Merkezi Merdivenköy Mah. Bora Sk. No: 1 Kat: 12-3031, 34732 Kadıköy* through a notification letter by public notaries or by sending us an application by presenting your IDs in person. Your request shall be evaluated and decided free of charge as soon as possible and within thirty (30) days at the latest. If the evaluation and decisionmaking process also requires a cost, the fee in the tariff specified in the Communiqué on the Procedures and Principles of Application to Data Controller shall be applied. In case you are unsatisfied with the response given by the Data Controller, you may apply to the Personal Data Protection Authority following your application submitted to Data Controller.