



**TAMEK SAGRA  
GRUP GIDA ÜRETİM A.Ş.  
PERSONAL DATA PROTECTION  
AND PROCESSING POLICY**

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**INTRODUCTION**

Pursuant to the Law No. 6698 on the Protection of Personal Data (“Law”), this **TAMEK SAGRA GRUP GIDA ÜRETİM A.Ş.** (“**TAMEK SAGRA**” or “**COMPANY**”) Policy on the Processing and Protection of Personal Data (“Policy”) (“**TAMEK SAGRA**” or “**COMPANY**”) Policy on the Processing and Protection of Personal Data (“Policy”) regulates the procedures and principles to be followed by “**TAMEK SAGRA**” in fulfilling its obligations regarding the protection and processing of personal data.

**1. PURPOSE and SCOPE**

It is aimed to maintain the principle of conducting “**TAMEK SAGRA**” activities in a transparent manner. In this context, the basic principles adopted in terms of the compliance of the **COMPANY**'s data processing activities with the regulations in the Personal Data Protection Law No. 6698 (“**KVK Law**”) are determined and the practices implemented by “**TAMEK SAGRA**” are explained.

The policy determines the processing conditions of personal data and sets out the main principles adopted by **TAMEK SAGRA** in the processing of personal data. In this framework, the Policy is for real persons whose personal data are processed, where all personal data processing activities within the scope of the Law are carried out automatically or non-automatically provided that they are part of any data recording system of the company.

“**TAMEK SAGRA**” reserves the right to make changes in the “Policy” in parallel with the legal regulations.

**1.1. Definitions**

COMPANY	TAMEK SAGRA GRUP GIDA ÜRETİM A.Ş.
Personal Data/s	Any information relating to an identified or identifiable natural person.
Sensitive Personal Data	Personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations or trade-unions, data concerning health, sexual life, criminal convictions and security measures, and the biometric and genetic data
Processing of Personal Data	Any operation which is performed on personal data, wholly or partially by automated means or non-automated means which provided that form part of a data filing system,

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	such as collection, recording, storage, protection, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization preventing the use thereof
Third Parties and persons whose personal data are processed by the "COMPANY"	Third-party real persons who are related to "TAMEK SAGRA" to ensure the security of commercial transactions with the above-mentioned parties or to protect the rights of the aforementioned persons and to obtain benefits. Joint debtor (Guarantor, Promissory Note Debtor) Companion, Family <del>Members and their relatives can be given as examples to these entities.</del>
Personal Data Subject / Relevant Person	"COMPANY" refers to its Stakeholders and Employees, Business Partners, Authorities, Job Applicants, Visitors, and Group Customers, Potential Customers, Third Parties and persons whose personal data are processed by it.
Data Recording System	It refers to the recording system in which personal data are structured and processed according to certain criteria.
Data Controller	Natural or legal person who determines the purposes and methods of processing personal data and is responsible for the establishment and management of the data recording system.
Data Processor	Natural and legal person who processes personal data on behalf of the data controller based on the authority given by the data controller.
Explicit Consent	Consent on a particular subject, based on information and expressed with free will
Anonymization	It is the process of making the data previously associated with a person impossible to be associated with an identified or identifiable natural person under any circumstances, even by matching with other data.
Law	Refers to the Law on Protection of Personal Data No. 6698.
KVK Board	Personal Data Protection Board.

## 1.2. Enforcement and Amendment

The policy was published on the website by the "COMPANY" and presented to the public. In case of conflict with the legislation in force, especially the Law, and the regulations included in this Policy, the provisions of the legislation shall apply. The "COMPANY" reserves the right to make changes in the "Policy" in parallel with the legal regulations. The current version of the Policy can be accessed from the website of the "COMPANY" [<https://www.tameksagra.com/>].

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## 2. PERSONAL DATA AND DATA SUBJECTS, DATA PROCESSING PURPOSE AND DATA CATEGORIES

### 2.1. What Are Your Personal Data?

Personal data means information that identifies or makes it identifiable. The categories of your personal data that can be processed by the "COMPANY" are listed below.

- **Identity Data:** This data category refers to data types such as TR Identity Number, name, surname, place and date of birth, marital status, gender, identity document sample.
- **Family Members and Acquaintances Information:** Information about family members and acquaintances of the personal data subject
  - **Communication Data:** Data group that can be used to reach the person (Phone, postal address, e-mail, fax number, IP address, )
- **Sensitive Personal Data:** This data category refers to data types such as health data received from personnel within the scope of personal and occupational safety.
- **Visual Data:** Photo taken at the entrance of the personnel to work or the image of the people in the camera recordings made for security purposes in the physical environments of the "COMPANY".
- **Personal Data of the Employee:** Type of data that includes the employee's identity, contact information as well as information such as profession, education, financial data etc.
- **Agreement Data:** All of the data such as signature, circular of signature, real person information that the "COMPANY" has entered into the database as a result of the contractual relationship established by the "COMPANY" with its customers, business partners, suppliers and external sources with which it has legal or commercial relations.
- **Location Data:** All of the location data of the employees processed by the "the "COMPANY" for internal audit purposes.
- **Performance Data:** All of the data processed for the personnel within the "COMPANY" for the purpose of internal audit and increasing operability, and for the performance audit of the business partners outside the "COMPANY".
- **Employee and Job Applicant Information:** Personal data processed about individuals who have applied to be an employee of the "COMPANY" or whose request has been evaluated in line with the human resources needs of the "COMPANY" in accordance with the rules of commercial practice and honesty, or who have a working relationship with the "COMPANY".
- **Physical Space Security Information:** Personal data regarding the records and documents such as camera recordings taken at the entrance to the physical space and during the stay in the physical space.
- **Visual Data:** Visual records that are clearly belonging to an identified or identifiable natural person and are included in the data recording system and associated with the personal data subject.

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- **Transaction Security Information:** Your personal data that is processed to ensure our technical, administrative, legal and commercial security while carrying out our commercial activities.
- **Risk Management Information:** Personal data that is clearly belonging to an identified or identifiable natural person and is included in the data recording system, and is processed in order to manage the commercial, technical and administrative risks of the "COMPANY".
- **Financial Information:** Personal data processed regarding the information, documents and records showing all kinds of financial results created according to the type of legal relationship established by the "COMPANY" with the personal data subject.
- **Request and Complaint Data:** Personal data regarding the receipt and evaluation of any request or complaint directed to the "COMPANY".

## 2.2. Data Subject Categories

Data subjects within the scope of the policy are all natural persons whose personal data are being processed by the "COMPANY". In this context, the categories of data subjects are as follows:

DATA SUBJECT CATEGORIES		DESCRIPTION
1	Employee	real persons performing services under the employment contract in the "COMPANY".
2	Intern	Real persons working as interns in the "COMPANY"
3	Employee Candidate	real persons who apply for a job by sending a CV to the "COMPANY" or by other methods.
4	Third Parties	Real persons excluding the categories mentioned above and the employees of the "COMPANY".
5	Business Partners / Shareholders / Supplier companies and their employees	Parties established by the "COMPANY" for purposes such as the conduct of its commercial activities or providing goods or services to the "COMPANY" on a contractual basis in accordance with the "COMPANY"s instructions and their employees in this context
6	Visitor	Real persons who visit the office and website of the "COMPANY".
7	Customer	Real persons who benefit from the products and services offered by the Company.

Data subject categories are specified for general information sharing purposes. The fact that the data subject does not fall under any of these categories does not remove the data subject's qualification as specified in the Law.

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### 2.3. Personal Data Processing Purposes

#### For Employees;

- Execution of Employee Satisfaction and Loyalty Processes
- Fulfillment of Employment and Legislation Obligations for Employees
- Conducting Audit / Ethical Activities
- Conducting Educational Activities
- Execution of Access Authorizations
- Execution of Activities in Compliance with the Legislation
- Execution of Finance and Accounting Affairs
- Planning of Human Resources Processes
- Execution / Supervision of Business Activities
- Execution of Occupational Health / Safety Activities
- Providing Information to Authorized Persons and Organizations
- Execution of Management Activities
- Ensuring Business Continuity Activities and Providing Physical Space Security
- Execution of Information Security Processes
- Execution of Benefits Processes for Employees
- Execution of Finance and Accounting Affairs
- Planning of Human Resources Processes
- Execution / Supervision of Business Activities
- Execution of Occupational Health / Safety Activities
- Providing Information to Business Authorized Persons, Companies and Organizations
- Execution of Management Activities
- Ensuring Business Continuity Activities and Providing Physical Space Security
- Execution of Information Security Processes
- To make necessary legal notifications to official institutions, to benefit from incentives before official authorities, to notify relevant authorities within the scope of official authority inspections
- Execution of human resources operations and especially personnel activities,
- To ensure employee supervision and to carry out necessary data processing activities within the scope of the employer's right to management

#### For Employee Candidates;

- Execution of the Selection and Placement Processes of the applicants with the Job Application Form

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- Execution of Job Application Processes
- Execution of human resources operations and especially recruitment processes,
- Conducting Business Continuity Ensuring Activities,
- Providing Physical Space Security
- Execution of Recruitment Policies and Employment and Contract processes within the scope of human resources operations management
- Follow-up of Requests/Complaints
- Execution of Information Security Processes
- Carrying out Internal Audit / Investigation / Intelligence Activities
- Execution of Activities in Compliance with the Legislation
- Providing Information to Authorized Persons, Institutions and Organizations
- Execution of Emergency Management Processes
- Execution of Communication Activities
- Conducting Business Continuity Ensuring Activities,
- Performing legal, technical and administrative activities,

#### **For Interns/Students**

- Follow-up of Requests/Complaints
- Execution of Information Security Processes
- Carrying out Internal Audit / Investigation / Intelligence Activities
- Execution of Activities in Compliance with the Legislation
- Providing Information to Authorized Persons, Institutions and Organizations
- Execution of Emergency Management Processes
- Execution of Communication Activities
- Conducting Business Continuity Ensuring Activities,
- Performing legal, technical and administrative activities,
- Regulation and Follow-up of Labor Relations,
- Providing Physical Space Security
- Organization and Event Management
- Execution of contract processes
- Conducting Business Continuity Ensuring Activities,
- Receiving and Evaluating Suggestions for Improvement of Business Processes
- Ensuring the Security of Movable Property and Resources
- Ensuring the Security of Data Controller Operations
- Execution of Occupational Health And Safety Activities,
- Making Wage Payments

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### **For Shareholders/Business Partners/Suppliers**

Within the scope of the commercial relationship between you and the “**COMPANY**”, the personal data of your company officials and employees can be processed in accordance with the basic principles stipulated in the Law within the scope of the establishment and performance of our contracts, the fulfillment of legal obligations and the legitimate interests of the “**COMPANY**” set forth in Article 5 of the Law and within the scope of the personal data processing conditions, within the scope of the following purposes.

- Execution of supply chain management processes,
- Performing functions such as enterprise resource planning, reporting, marketing, etc.,
- Execution of investment and marketing processes of products/services,
- Determining risk limits and performing collateralization studies,
- To be able to carry out the necessary quality, confidentiality and standard audits,
- Fulfillment of the requirements determined by laws and regulations (tax legislation, legislation for the protection of consumers, legislation on the law of obligations, legislation on commercial law, customs legislation, legislation on electronic communication, etc.)
- Fulfillment of obligations related to E-Invoice, E-Waybill and E-Archive,
- Fulfilling the demands of public institutions and organizations as required or required by legal regulations,
- Fulfillment of legal obligations specified in KVKK.
- Ensuring the Security of Data Controller Operations
- Ensuring the Security of Movable Property and Resources
- Follow-up of Requests/Complaints
- Execution of Storage and Archive Activities
- Execution of Advertising / Campaign / Promotion Processes
- Execution of Performance Evaluation Processes
- Conducting Marketing Analysis Studies
- Organization and Event Management
- Execution of Activities for Customer Satisfaction
- Execution of Customer Relationship Management Processes
- Execution of Goods / Services Production and Operation Processes
- Execution of Goods / Services Sales Processes
- Authentication and registration creation,
- “**COMPANY**” negotiations and signing of contracts
- For the purpose of fulfilling the “**COMPANY**” contract processes and informing,
- Execution of Strategic Planning Activities Execution of Risk Management Processes
- Execution of Communication Activities
- Carrying out Internal Audit / Investigation / Intelligence Activities

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- Execution of Company / Product / Service Loyalty Processes
- Ensuring Physical Space Security Execution of Goods / Services After Sales Support Services
- Execution of Information Security Processes

**For Customers;**

- Execution of Customer Relationship Management Processes
- Providing Physical Space Security
- To carry out transactions and activities within the scope of commercial / contractual relationship and to fulfill financial and legal obligations
- Promotion and marketing of products and services, contacting you about them
- Follow-up of Requests/Complaints
- Fulfillment of warranty obligations within the scope of manufacturer's responsibility
- For the purpose of ensuring and auditing the quality, information security and privacy policies and standards of the "**COMPANY**".
- Recording and tracking information about payments,
- In order to prepare reports and analyzes to be made to the senior management
- Execution of Activities for Customer Satisfaction
- Execution of Customer Relationship Management Processes
- Execution of Goods / Services Production and Operation Processes
- Execution of Goods / Services Sales Processes
- Execution of Goods / Services After-Sales Support Services
- Execution of Goods / Services Procurement Processes
- Execution of Logistics Activities
- Carrying out Internal Audit / Investigation / Intelligence Activities
- Execution of Company / Product / Service Loyalty Processes
- Execution of Information Security Processes
- In order to fulfill the requirements determined by laws and regulations (Tax Legislation, Social Security Legislation, Law of Obligations Legislation, Commercial Law Legislation, Consumer Protection Law, Electronic Communications Legislation etc. all relevant legislation)
- Execution of Goods / Services Sales Processes
- In order to fulfill the demands of public institutions and organizations as required or mandated by legal regulations
- Fulfillment of legal obligations specified in the law

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#### **For Potential Customers;**

Your identity and contact information obtained directly from you through your visits to company premises, your requests for orders and price offers to our center, your complaints, and the business cards you share at fairgrounds and events (the data on the business card is considered public), is processed in accordance with Article 5/2 of the Law for the creation of offers for the requested products, the establishment of the contract, and the management of your requests and complaints, and they are processed based on your consent, if you are not a trader or a tradesman, in accordance with the marketing purpose, within the framework of the aim of being aware of the products and services of the "**COMPANY**" and offering you a number of special products.

#### **For Visitors;**

Within the scope of your visits to the "**COMPANY**", our website and other workplaces, in addition to ensuring the safety of the company and you, fulfilling our legal obligations and depending on our legitimate interests, in physical environments, security cameras and visitor logs and your identity and visual data are processed for the following purposes:

- Conducting Audit / Ethical Activities
- Execution of Information Security Processes
- Creating and Tracking Visitor Records
- Providing Physical Space Security
- Providing Information to Authorized Persons, Companies and Organizations
- Ensuring the Security of Data Controller Operations

### **3.PROCEDURES AND PRINCIPLES TO BE FOLLOWED IN THE PROCESSING OF THE DATA**

#### **3.1. Principles Regarding the Processing of Personal Data**

Your personal data is processed by the "**COMPANY**" in accordance with the personal data processing principles set forth in Article 4 of the Law. The "**COMPANY**" attaches importance to processing your personal data in accordance with the law and the rules of honesty, for data processing purposes only. In order to ensure that personal data is correct and up-to-date, data subjects are given the right to request correction or deletion of their correct and outdated data.

The "**COMPANY**" makes the necessary assessments for the processing of personal data for specific, clear and legitimate purposes for each category of personal data subject.

Personal data is deleted, destroyed or anonymized by the "**COMPANY**" in order to ensure that personal data is kept for as long as required by the legislation or processing purposes, after the purpose of processing personal data disappears or after the expiry of the period stipulated in the legislation.

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### 3.2. Conditions Regarding the Processing of Personal Data

According to the 2nd paragraph of the 5th article of the KVKK and the 2nd paragraph of the 8th article of the KVKK, **without the explicit consent** of the personal data subject,

- Provided that it is directly related to the conclusion of the contract and the performance of the services,
- In cases where data processing is mandatory for the establishment, exercise or protection of a right,
- In cases of necessity for the "**COMPANY**" to fulfill its legal obligation,
- In cases where data processing is mandatory for the legitimate interests of the "**COMPANY**", provided that the fundamental rights and freedoms of the other party (visitor, employee, employee candidate, visitor, business partner) are not harmed,
- If it is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid,
- If the other party has made it public by himself/herself, the personal data requested from him/her will be given to the "**COMPANY**" accurately and up-to-date, and this personal data will be processed and transferred by the "**COMPANY**".

### 3.3. Conditions Regarding the Processing Sensitive Personal Data

In Article 6 of the Law, sensitive personal data are specified in a limited number. Personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations or trade-unions, data concerning health, sexual life, criminal convictions and security measures, and the biometric and genetic data are deemed to be special categories of personal data.

The "**COMPANY**" may process your sensitive personal data in the following cases by taking the necessary precautions:

- The processing of sensitive personal data other than health and sexual life can only be processed if the data subject gives explicit consent or if it is expressly stipulated in the law.
- Personal data concerning health and sexual life may only be processed, without seeking explicit consent of the data subject, by the persons subject to secrecy obligation or competent public institutions and organizations, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing.

## 4. THE METHOD AND LEGAL BASIS OF COLLECTION OF YOUR PERSONAL DATA

Your personal data is collected through all kinds of physical, audio and electronic media such as website visits, contract establishment and execution processes, recruitment processes, visits to our workplaces,

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calling the customer service line. Depending on the nature of the personal data and the purpose of processing, it will be collected based on the 2nd paragraph of Article 5 of the Law and the following reasons for compliance with the law (explained above), and if there is no such reason, it will be collected based on your explicit consent. Your personal data may be collected, processed and transferred for the purposes stated in this Policy, based on the legal reasons listed below, by fully automatic, partially automatic or non-automatic methods.

- It is stipulated in the local or foreign legislation to which the "COMPANY" is subject,
- Provided that it is directly related to the establishment or performance of a contract, it is necessary to process the personal data of the parties to the contract, to be able to offer the requested products and services or to fulfill the requirements of the contracts you have concluded,
- Data processing is mandatory for the "COMPANY" to fulfill its legal obligations,
- Made public by you,
- Data processing is mandatory for the establishment, exercise or protection of a right as per the legislation or internal practice of the "COMPANY",
- Data processing is mandatory for the legitimate interests of the "COMPANY", provided that it does not harm your fundamental rights and freedoms.

#### 5. TRANSFER OF PERSONAL DATA

In accordance with the additional regulations listed in Articles 8 and 9 of the KVK Law and determined by the Personal Data Protection Board, personal data can be transferred at home or abroad in case of conditions for transferring personal data.

In the presence of at least one of the data processing conditions explained in the 5th and 6th articles of the Law and explained under the 3rd Title of this Policy, provided that it complies with the basic principles regarding the data processing conditions, transfer of personal data to third parties in the country, your personal data can be transferred by the "COMPANY".

In cases where the person does not have explicit consent, in the presence of at least one of the data processing conditions explained in the 5th and 6th articles of the Law and explained under the 3rd Title of this Policy, and on the condition of complying with the basic principles regarding the data processing conditions, personal data can be transferred abroad.

**Our "COMPANY" does not transfer abroad within the framework of current practices.**

**In accordance with the general principles of the Law and the data processing conditions in Articles 8 and 9, the "COMPANY" can transfer data to the following Real and Legal Persons:**

- Limited to the procurement of outsourced services (Software, enterprise resource planning, reporting, marketing, etc.) With our other business partners and suppliers, with whom we cooperate and / or receive services for the purpose of providing and

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promoting products and services, performing functions such as software, enterprise resource planning, reporting, marketing, etc., to benefit from promotions and campaigns and for similar purposes.

- Audit firms, independent audit firms, customs firms, financial advisors/accounting firms, law firms, provided that they are legally authorized to obtain information and documents from the "**COMPANY**" and are limited to the purpose,
- With companies that process data on behalf of our company (providing IT support, providing traffic/customer satisfaction measurement, profiling and segmentation support, providing support in matters where personal data needs to be processed, especially sms, mailing, archiving in the field of sales and marketing),
- With service providers in order to process your orders, manage your account, carry out commercial activities and ensure their continuity,
- With banks and payment instrument systems companies for payment services, risk limit determination, collateralization, debt restructuring purposes,
- With audit firms and information security firms in order to carry out the necessary quality, confidentiality and standard audits,
- With public institutions and organizations in order to fulfill legal requirements and / or to fulfill the demands of official authorities

## 6. CLARIFICATION AND RIGHTS OF DATA SUBJECTS

In accordance with Article 11 of the Law, we declare that you have the following rights as a personal data subject:

- 1-) Learning whether your personal data is processed or not,
- 2-) If your personal data has been processed, requesting information about it,
- 3-) Learning the purpose of the processing of your personal data and whether these personal data are used in compliance with the purpose,
- 4-) Knowing the third parties to whom your personal data is transferred in the country,
- 5-) Requesting correction of your personal data in case of incomplete or incorrect processing and requesting notification of the transaction made within this scope to the third parties to whom your personal data has been transferred,
- 6-) Requesting the deletion or disposal of personal data in the event that the reasons requiring its processing cease to exist despite the fact that it has been processed in accordance with the Law and other relevant law provisions, and requesting the notification of the transaction made within this scope to the third parties to whom your personal data has been transferred,
- 7-) Objecting to a result against you by analyzing the processed data exclusively through automated systems,
- 8-) Claiming compensation for the damage arising from the unlawful processing of your personal data.

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## 7. ENSURING THE SECURITY AND CONFIDENTIALITY OF PERSONAL DATA

In order to prevent the unlawful disclosure, access, transfer of personal data or security deficiencies that may occur in other ways, the “COMPANY” takes all necessary measures, within the possibilities, according to the nature of the data to be protected. In this context, all necessary administrative and technical measures are used by the “COMPANY”, an audit system is established within the “COMPANY”, and in case of unlawful disclosure of personal data, actions are taken in accordance with the measures envisaged in the KVK Law.

## 8. DISPOSAL OF PERSONAL DATA

A DATA DISPOSAL POLICY, which determines the methods of destruction of personal data, has been prepared and published on the web page of “TAMEK SAGRA” ([www.tameksagra.com](http://www.tameksagra.com)). All data disposal processes are carried out in accordance with this policy. Although it has been processed in accordance with the law in accordance with Article 7 of the Law, in the event that the reasons requiring its processing are eliminated, the “COMPANY” disposes the personal data ex officio or upon the request of the Data Subject, in accordance with the Data Protection and Disposal Policy, legislation and the guide published by the “COMPANY”, which it has specially prepared for this work. In the personal data inventory prepared by the “COMPANY” and regulating all data processing processes, STORAGE PERIOD are clearly determined for each data type and process, and these periods are taken as basis in disposal processes.

Although it has been processed in accordance with the law in accordance with Article 7 of the Law, in the event that the reasons requiring its processing are eliminated, the “COMPANY” deletes, disposes or anonymizes personal data ex officio or in accordance with the guidelines published by the “COMPANY” upon the request of the Data Subject.

## 9. ISSUES REGARDING THE PROTECTION OF PERSONAL DATA

In accordance with Article 12 of the KVK Law, “TAMEK SAGRA GRUP GIDA ÜRETİM A.Ş.” takes the necessary technical and administrative measures to ensure the appropriate level of security in order to prevent the unlawful processing of the personal data it processes, to prevent unlawful access to the data and to ensure the preservation of the data, and in this context, it performs or has made the necessary inspections.

**9.1. TECHNICAL MEASURES:** The main technical measures taken by “TAMEK SAGRA” to ensure the legal processing of personal data are as follows:

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- External data storage area (one) is used online in the "**COMPANY**".
- Backups of systems containing data are taken regularly and their reporting is done by the "**COMPANY**".
- File sharing containing personal data to real and/or legal persons is protected by the "**COMPANY**".
- There are two physical servers in the "**COMPANY**" and there is no virtualization.
- Security measures regarding the server system are taken and the server is kept under protection against external risks by the "**COMPANY**".
- Employees of the "**COMPANY**" cannot access the system with their personal devices.
- The authority matrix for the employees has been determined by the "**COMPANY**". Which employee can access which information and the limits of authority are determined.
- The software running on the devices used in the "**COMPANY**" is up-to-date and licensed.
- Anti-virus software and sand box software / hardware are up-to-date on the devices used in the "**COMPANY**".
- The "**COMPANY**" does not have a department within the scope of supply, development and maintenance of information technology systems, outsourcing services are outsourced by the "**COMPANY**".
- When external users / guests, etc., log in to the systems used in the "**COMPANY**", they cannot access the information source.
- Data loss prevention software is used by the "**COMPANY**".
- It is not possible to access the system used in the "**COMPANY**", where personal data is stored, via VPN.
- There is no personal data on the website of the "**COMPANY**".

## **9.2 ADMINISTRATIVE MEASURES:** The main administrative measures taken by "**TAMEK SAGRA**"

to ensure the legal processing of personal data are as follows:

- Employees of the "**COMPANY**" are informed and trained on the law of protection of personal data and the processing of personal data in accordance with the law.
- All personal data processing activities carried out by the "**COMPANY**" are carried out in accordance with the personal data inventory and annexes created by analyzing all business units in detail.
- Personal data processing activities carried out by the relevant departments within the "**COMPANY**" and obligations to be fulfilled in order to ensure that these activities comply with the personal data processing conditions sought by KVKK are bound by the written policies and procedures by the "**COMPANY**", and each business unit has been informed about this issue and the issues to be considered specific to the activity it carries out have been determined. In addition, protocols and procedures for sensitive personal data security have been determined and implemented.

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- The supervision and management of the departments within the "**COMPANY**" regarding personal data security is **organized by the Personal Data Protection Committee**. Awareness is created in order to meet the legal requirements determined on the basis of the business unit, and necessary administrative measures are implemented through in-house policies, procedures and trainings to ensure the continuity of the implementation and supervision of these issues. In-house periodic and/or random audits are conducted and made.
- The service agreements and related documents between the "**COMPANY**" and the employees, including information and data security regarding personal data, are recorded and additional protocols are made. Studies have been carried out to create the necessary awareness for employees in this regard. The authorizations of employees who have a change in duty or quit their job in this field are removed.
- Personal data security problems are quickly reported by the "**COMPANY**" and personal data security is monitored.
- Necessary security measures are taken regarding entry and exit to physical environments containing personal data and the security of environments containing personal data is ensured, and the security of physical environments containing personal data against external risks (fire, flood, etc.) is provided by the "**COMPANY**".
- Personal data processed by the "**COMPANY**" are reduced as much as possible.
- Confidentiality commitments are made by the "**COMPANY**".
- Personal data security is monitored, periodic and/or random audits are carried out and made by the "**COMPANY**".

## 10. COMMUNICATION

You can submit your applications regarding your rights listed above by filling out the Data Subject Application Form, which you can access on our website on ([www.tameksagra.com](http://www.tameksagra.com)), or with another written document with the same content, to the address of our Company stated below. You can send all your requests in writing to the postal addresses listed below. In case the data subjects (owners) submit their requests regarding their personal data to "**TAMEK SAGRA**" in writing, the "**COMPANY**", as a data controller, carries out the necessary processes to ensure that the request is finalized as soon as possible and within thirty (30) days at the latest, depending on the nature of the request, in accordance with Article 13 of the KVK Law. Within the scope of ensuring data security, the "**COMPANY**" may request information in order to determine whether the applicant is the owner of the personal data subject to the application. The "**COMPANY**" may also ask questions about the application of the Data Subject in order to ensure that the application is concluded in accordance with the request. In cases where the application of the person concerned is likely to impede the rights and freedoms of other persons, requires disproportionate effort, and the information is publicly available, the request may be rejected by the "**COMPANY**" by explaining the reason.

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