



**TAMEK SAGRA
GRUP GIDA ÜRETİM A.Ş.
PROTECTION OF PERSONAL DATA
GENERAL CLARIFICATION AND
INFORMATION TEXT**

Document No	TLM-370-İK
First Publication Date	01.01.2023
Revision Date/No	26.11.2024/02
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This Clarification Text has been prepared by **TAMEK SAGRA GRUP GIDA ÜRETİM A.Ş.** (will be referred to as “COMPANY” or “TAMEK SAGRA”). in the capacity of data controller within the scope of the Communiqué on the Procedures and Principles to be Complied with in Fulfilling the Disclosure Obligation with Article 10 of the Law on the Protection of Personal Data No. 6698 (“KVKK”). We declare that the personal data transmitted to “TAMEK SAGRA” is not used other than for the purposes of obtaining personal data, is not processed and shared with third parties without express consent or the existence of any of the exceptional circumstances in Article 5 of the KVK Law, and all necessary administrative and technical measures have been taken to ensure the appropriate level of security in this regard.

1. Which of your Personal Data is Processed within the scope of our activities and What are the Purposes of Processing Your Personal Data?

1.1. Employee Candidates;

- **Identity Information** (Name, surname, TR identity number, date of birth, place of birth, marital status, nationality, copy of identity card)
- **Gender Information** (Gender Information)
- **Contact Information** (Phone number, Address Information obtained within the scope of Residence Certificate, E-Mail Address),
- **Reference Information** (CV information, names that she/he reported as reference in the application form),
- **Educational Information** (Diploma – Copy of Completion Certificate/E-Government Statement, Foreign language knowledge / Course attended, internship/course/seminars and certificates received, awards),
- **Professional Experience Information** (Performance data obtained as a result of the skill tests applied during the job interview, courses, seminars and certificates s/he has received, awards, places s/he has worked in the past),
- **Physical Space Security Information** (Images recorded with camera recordings)
- **Audio and Visual Recordings** (Photo taken from you for the job application form / added to your CV),
- **Legal Transaction Information** (Information containing personal data in correspondence with judicial authorities and in lawsuits and response petitions to be submitted to the courts in a possible judicial process),
- **Health Data / sensitive data** (Health data transmitted by the person's own consent),
- **And Other Information** (Driver's License Information / Photocopy of Driver's License, Military Service Status Certificate obtained via E-Government, Computer Usage Level Information, Computer Programs Used, SSI Employment Statement, Smoking habit, signature information, handwriting),

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1.2. From the Employees:

- **Identity information** (Name, surname, TR ID number, Date of birth, Place of birth, Marital status, Nationality, Photocopy of Identity Card, Family members identity information, Parents' name)
- **Contact Information** (company or personal e-mail address, Residence Address, Home and mobile phone number),
- **Professional Information** (Position name, department and unit, title, last employment date, employment entry and exit dates, insurance entry, social security number, tax office number, Emekli Sandığı registration number, Bağkur registration number, number of working days, projects worked, monthly total overtime information, severance pay base date, additional days of severance pay, leave seniority base date, leave seniority additional days, leave group, departure/return date, day, reason for leave)
- **Financial Information** (Financial and salary details, payrolls, premium progress, premium amounts, file and debt information related to enforcement proceedings, bank passbook),
- Body size information (for clothes and equipment to be used in the workplace),
- Health Data/sensitive data (Health report regarding blood type, occupational disease, disability, blood and other tests taken within the scope of the Periodic Inspection Report, vaccination information, ECG, Incapacity Report, Lung X-ray, Pulmonary Function Test, Audiometry test; Hemogram), (Health data transmitted voluntarily by the person)
- **Educational Information** (Diploma – Copy of Completion Certificate/E-Government Statement, Foreign language knowledge / Course attended, internship/course/seminars and certificates received, awards),
- **Professional Experience Information** (Performance data obtained as a result of the skill tests applied during the job interview, courses, seminars and certificates s/he has received, awards, places s/he has worked in the past),
- **Physical Location Security Information** (Camera records information),
- **Audio and Visual Recordings** (with the purpose and scope of sharing goodwill and wishes via WhatsApp in cases such as social events, birthdays, death)
- **Legal Transaction Information** (Information containing personal data in correspondence with judicial authorities and in lawsuits and response petitions to be submitted to the courts in a possible judicial process),
- **And Other Information** (Driver's License Information, Military Information, Computer Usage Level Information, smoking habit information, signature information, handwriting)

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1.3. From Customers;

- **Identity information** (Legal Entity Authorized Representative/Real Person Name, surname, TR identity number)
- **Contact Information** (Telephone number, e-mail address, address to ship the product),
- **Financial Information** (Tax identification number, bank account number, invoice information),
- **Physical Space Security Information** (Images recorded with camera recordings),
- **Audio and Visual Recordings** (photos and videos taken in the workplace / workplaces to be used within the scope of the promotional activities of the **COMPANY**),
- **Legal Transaction Information** (Information containing personal data in correspondence with judicial authorities and in lawsuits and response petitions to be submitted to the courts in a possible judicial process),
- **Customer Transaction Information** (Demand Information, Complaint Information),
- **Risk Management** (Information processed for the management of commercial, technical, administrative risks, etc.)

1.4. From Visitors;

- **Physical Space Security Information** (Images recorded with camera recordings),
- **Identity Information** (Name Surname)
- **Visit Information** (about which department or person s/he visited)
- **Contact Information** (mobile number)
- **Audio and Visual Recordings** (photos and videos taken within the scope of the "**COMPANY**" promotional activities),
- **Legal Transaction Information** (Information containing personal data in correspondence with judicial authorities and in lawsuits and response petitions to be submitted to the courts in a possible judicial process)
- **And Other Information** (Medical documents, questionnaires, form information that you submit voluntarily and)

1.5. From Interns/Students;

- **Identity Information** (Name, surname, TR ID number, Date of birth, Place of birth, Marital status),
- **Contact Information** (Phone number, Address Information, e-mail address),
- **Physical Space Security Information** (Images recorded with camera recordings),
- **Gender Information,**
- **Audio and Visual Recordings** (Photographs and videos taken in workplaces / workplaces to be used within the scope of the **COMPANY**'s promotional activities),
- **Legal Transaction Information** (Information containing personal data in correspondence with judicial authorities and in lawsuits and response petitions to be submitted to the courts in a possible judicial process),
- **Transaction Information** (Demand Information, Complaint Information.),
- **Data in the categories of Health Data** (Health data transmitted voluntarily);

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1.6. Guest Internet Users;

- **Identity Information** (Name and Surname)
- **Contact Information** (mobile phone number)
- **Transaction Security Data** (IP address information distributed in their own internal networks, start and end time of use, information showing the unique network device number (MAC address) of computers using IP addresses, target IP address, real IP and port information allocated to the user in the internet access service provided by the method of sharing one or more IP addresses to users via ports, URL address information recorded by the content filtering system in order to take measures to prevent access to content that constitutes a crime)

We collect and process for Execution of Emergency Management Processes, Execution of Information Security Processes, Execution of Infrastructure Works (Software/Hardware) Processes of Units Such as Information Processing and IT, Fulfillment of Obligations Arising from Employment Contracts and Legislation for Employees, Regulation and Monitoring of Labor Relations, Execution of Activities in Accordance with Legislation, Execution of Finance and Accounting Affairs, Execution of Loyalty Processes to Company/Product/Services, Ensuring Physical Space Security, Monitoring and Execution of Legal Affairs, Execution of Activities with Legal/Technical and Administrative Results, Execution of Internal Audit/Investigation/Intelligence Activities, Execution/Supervision of Communication Activities, Recruitment Policies and Employment and Personnel Management within the Scope of Human Resources Operations Management, Execution of Social Solidarity Activities among Employees (sharing of birth, death, congratulations, etc. information) of Business Activities Execution / Audit, Execution of Occupational Health and Safety Activities, Receiving and Evaluating Suggestions for the Improvement of Business Processes, Execution of Business Continuity Activities, Execution of After-Sales Support Services for Goods / Services, Execution of Goods / Services Sales Processes, Execution of Goods / Services Production and Operation Processes, Execution of Customer Relationship Management Processes, Execution of Activities for Customer Satisfaction, Organization and Event Management, Execution of Marketing Analysis Studies, Execution of Advertising / Campaign / Promotion Processes, Execution / Audit of Risk Management Processes, Execution of Storage and Archive Activities, Monitoring of Insurance Transactions, Execution of Contract Processes, Monitoring of Requests / Complaints, Within the Scope of Promotion Activities, Making Payments of Fees, Execution of Marketing Processes of Products / Services, Requirements of Law No. 5651 and related regulations and ISO 27001 Information Security Management System standard, Security of Data Controller Operations We collect and process it for the purposes of Providing Information to Authorized Persons/Institutions and Organizations, Carrying Out Management Activities and Creating and Monitoring Visitor Records.

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2. To Whom And For Which Purposes The Processed Personal Data May Be Transferred

We may transfer your personal data, which has been categorized above and whose processing purposes are specified, **to your attorneys and representatives authorized by you** (in order for us to fulfill our legal obligations), **to authorized public institutions and organizations** (for us to fulfill our burden of proof in a possible judicial process, to fulfill our obligations arising from laws and other legal regulations), **to Attorneys, Consultants, JHS, OHS, Audit Companies, OYAK Affiliates and Group Companies and Other Private Law Legal Entities** (for the performance of Business Activities and fulfillment of responsibilities arising from the law), and **to the persons you refer to by you** (for confirmation).

3. Collection Method and Legal Reason of Your Personal Data

Your personal data can be collected by "TAMEK SAGRA" in accordance with the purposes listed above, by filling in the requested information on the screen that appears when you log in to the internet with your computer and other mobile devices electronically, by entering data into our company's information systems or by filling in the application form by you, automatically or non-automatically, in writing, verbally or electronically. Your personal data is collected within the scope of the legal reasons specified in Articles 5 and 6 of the Law, within the scope of the establishment or performance of the contract, "TAMEK SAGRA's" legitimate interests and the fulfillment of its legal obligations, the establishment, use or protection of a right and, if applicable, the explicit consent of the relevant person.

4. Storage and Deletion of Data

Our company stores the personal data it processes for the periods determined by the legislation. In the absence of a separate period specified in the legislation, personal data are stored for the period that requires processing in accordance with the practices of our Company and the practices of commercial life, depending on the services our Company provides while processing that data, and after this period, only for the periods of time required in practice in order to constitute evidence in possible legal disputes. After the expiry of the specified periods, the personal data in question are deleted, destroyed or anonymized. Details regarding the storage and disposal of personal data can be found in **TAMEK SAGRA GRUP GIDA ÜRETİM A.Ş. PERSONAL DATA PROTECTION, STORAGE AND DISPOSAL POLICY** at <https://www.tameksagra.com/uploads/file/pol-007-ik-2-kisisel-verilerin-korunmasi-kisisel-verileri-saklama-ve-imha-politikasi.pdf>

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5. Data Security

The Company protects your personal data in full compliance with all technical and administrative security controls that must be taken in accordance with information security standards and procedures. The said security measures are provided at a level appropriate to the possible risk, taking into account technological and economic opportunities. The Company carries out or has it made the necessary inspections within its own body in order to ensure the implementation of the provisions of the Law. Details regarding the protection and security of personal data can be found in **TAMEK SAGRA GRUP GIDA ÜRETİM A.Ş. PERSONAL DATA PROTECTION, STORAGE AND DISPOSAL POLICY** at <https://www.tameksagra.com/uploads/file/pol-007-ik-2-kisisel-verilerin-korunmasi-kisisel-verileri-saklama-ve-imha-politikasi.pdf>

The Company also pays the utmost attention and care to the following:

- Employing personnel who are knowledgeable in establishing and operating systems in accordance with the principles and relevant legislation regarding the processing of personal data,
- Providing trainings to ensure that personnel are informed about personal data, including provisions regarding compliance with personal data protection legislation and Company practice rules in personnel contracts
- Using backup programs in accordance with the legislation that ensure the safe storage of personal data,
- If a service covering personal data processing processes is outsourced, including the provisions in the contracts made with outsourcing companies to take the necessary security measures for the protection of personal data and to ensure that these measures are complied with in their own organizations,

4. Your Rights Enumerated in Article 11 of the Law as Personal Data Subject

Article 20 of the Constitution states that everyone has the right to be informed about the personal data related to her/him, and the right to "request information" is among the rights of the personal data subject with Article 11 of the KVKK. In this context, our Company provides the necessary information in case the personal data subject requests information, and with this Statement, our Company informs the data subject about how the right to request information will be exercised and how the issues related to the information request will be evaluated.

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Pursuant to Article 11 of the Law, you can benefit from the following rights by applying to our Company: a) Learning whether your personal data is processed or not, b) Demanding for information as to if your personal data have been processed, c) Learning the purpose of the processing of your personal data and whether these personal data are used in compliance with the purpose, d) Learning the parties to which your personal data is transferred in the country / abroad, e) Requesting correction of your personal data if it is incomplete / incorrectly processed, f) Requesting the deletion / disposal of your personal data, g) Requesting notification of the transactions made pursuant to subparagraphs (e) and (f) above, to the third parties to whom your personal data is transferred, h) Objecting to the emergence of a result against you due to the analysis of your personal data exclusively by automated systems, i) Requesting the restriction of the processing of your personal data, j) Requesting your personal data in a formatted, generally machine-readable format; and k) Claiming compensation for the damage arising from the unlawful processing of your personal data

Since the following cases are excluded from the scope of KVKK in accordance with Article 28 of the KVKK, personal data subjects cannot claim their above-mentioned rights in these matters:

- Personal data are processed for official statistics and provided that they are being anonymized for the purposes for such as research, planning and statistics.
- Personal data are processed with artistic, historical, literary or scientific purposes, or within the scope of freedom of expression provided that national defence, national security, public security, public order, economic security, right to privacy or personal rights are not violated or the process doesn't constitute a crime.
- Personal data are processed within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations duly authorised and assigned by law to maintain national defence, national security, public security, public order or economic security.
- Personal data are processed by judicial authorities or execution authorities with regard to investigation, prosecution, judicial or execution proceedings.
- Personal data are processed by natural persons within the scope of purely personal activities of the data subject or of family members living together with him/her in the same dwelling provided that it is not to be disclosed to third parties and the obligations about data security is to be complied with.

Pursuant to Article 28/2 of the KVKK, provided that it is in compliance with and proportionate to the purpose and fundamental principles of this Law, Article 10 regarding the data controller's obligation to inform, Article 11 regarding the rights of the data subject, excluding the right to claim compensation, and Article 16 regarding the obligation to register with the Data Controllers' Registry shall not be applied in the following cases where personal data processing: in the following cases, personal data subjects cannot claim the above-

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mentioned rights in these matters, except for the right to demand the compensation of the damage:

- The processing of personal data is necessary for the prevention of crime or for criminal investigation.
- Processing of personal data made public by the personal data subject about herself/himself.
- Personal data processing is necessary for the execution of supervisory or regulation duties and for disciplinary investigation or prosecution by assigned and authorized public institutions and organizations and professional organizations in the nature of public institution, based on the authority given by the law.
- The processing of personal data is necessary for the protection of the economic and financial interests of the State with regard to budgetary, tax and financial matters.

5. Application, Complaint and Communication

You can send your information and application requests to the address “Oyak Dragos Plaza Cevizli Mahallesi Tugay Yolu Caddesi No: 10C Kat:9-11 Maltepe - İstanbul / Türkiye” by registered letter with return receipt or by submitting a form in person by filling in “**Personal Data Subject Application Form**” at <https://www.tameksagra.com/kvkk> of your requests within the scope of the law in accordance with the methods specified in the form at <https://www.tameksagra.com/>, and you can apply via e-mail kvkk@tameksagra.com TAMEK SAGRA concludes your requests as soon as possible and within thirty days at the latest, with the first request free of charge, depending on the nature of the request. However, in subsequent requests on the same subject or in the first request, if the transaction requires an additional cost, a fee may be charged at the rate stipulated in the law. TAMEK SAGRA may accept and process the request or reject the request in written form by explaining the reason.

In cases where the application made by following the above-mentioned procedure is rejected, the answer given is insufficient, or the application is not answered in due time, there is the right to file a complaint with the Personal Data Protection Board (“Board”) within thirty days following the notification of the reply and in any case within sixty days from the date of application. However, it is not possible to apply to the complaint procedure without using the application. For comprehensive information on the principles of protection and processing of your personal data, you can review the Personal Data Processing and Protection Policy on the company's website. You can send all your requests in writing to the following correspondence/contact or e-mail addresses.

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Keş Address : tamekgrup@hs01.kep.tr
E-mail Address : kvkk@tameksagra.com
Web Address : <https://www.tameksagra.com/>

CONSENT

Write "I have read and understand" in your own handwriting:

.....

A copy of this Procedure has been received by me.

Name and Surname of the Data Subject:

Signature:.....

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