

**FORMFLEKS OTOMOTİV YAN SANAYİ VE TİCARET A.Ş.**  
**DISCLOSURE STATEMENT REGARDING**  
**THE PROTECTION AND PROCESSING OF PERSONAL DATA**

**1. General Definition**

Within the context of the Law no 6698 on the Protection of Personal Data, personal data encompasses any and all data relating to an identified or identifiable natural person.

A specific kind of personal data known as Sensitive Personal Data means data on racial or ethnic origin, political opinions, religious, philosophical, denominational or other beliefs, appearance or clothing, or membership in trade unions, associations or foundations, data concerning a natural person's health or sex life, criminal convictions and security measures, biometric and genetic data.

The processing of personal data means any operation, such as the collection, recording, storage, preservation, alteration, restructuring, disclosure, transmission, acquisition, otherwise making available, classification or prevention of use, which is performed on personal data wholly or partially by automated means or my non-automated means provided that it is performed as part of a data recording system.

**2. Data Controller**

In line with the Law no 6698 on the Protection of Personal Data, FORMFLEKS A.Ş. may, as Data Controller, process your personal data within the context explained below.

**3. Collection and Processing of Personal Data**

The Company may acquire personal data both directly from the data subject and indirectly from third persons or from among data the data subject her/himself has opened to the public domain. Within this context, data is collected through verbal, physical or electronic media and such personal data is processed. The kinds of personal data being collected, how such data is collected and the types of personal data that may be processed by us have been indicated in the table below.

<b>Job Applicant</b>	
<b>Data Category</b>	<b>Source from which Data was Acquired</b>
<b>Identifying Information</b> Name, surname, all ID information, T.R. ID Number, nationality, marital status, birthplace, birthdate, photocopy of ID card, passport number	1. provided by the job applicant. 2. acquired from hiring platforms such as kariyer.net, etc.
<b>Contact Information</b> Telephone number, postal address, e-mail address, registered electronic mail (KEP) address	1. provided by the job applicant. 2. acquired from hiring platforms such as kariyer.net, etc
<b>Financial Information</b> Financial information, salary information, findeks information* (credit rating, financial position report)	1. created or acquired by the company.
<b>Sensitive Personal Data</b> any physical or psychological abnormalities, existence of a handicap, existence of a contagious disease, any religious affiliation and blood type information included on the photocopy of the ID	1. provided by the job applicant. 2. acquired from hiring platforms such as kariyer.net, etc.
<b>Education Information</b> education level, details regarding any certifications and	1. provided by the job applicant. 2. acquired from hiring platforms such as kariyer.net, etc.

diplomas, the name of the last school graduated and year of graduation, training and skills, resume (CV)	
<b>Visual and Audial Data</b> passport photograph, photograph on the photocopy of the ID, images from the closed circuit security camera feed	1. photograph and ID to be provided by the job applicant. 2. Images from security cameras are obtained through closed circuit security cameras
<b>Current and Past Employment Information</b> job title, CV, job application forms, previous employment	1. provided by the job applicant. 2. acquired from hiring platforms such as kariyer.net, etc
<b>Other</b> status of military service, deferment documentation, signature, criminal record, any problems with drugs, alcohol	1. provided by the job applicant. 2. acquired from hiring platforms such as kariyer.net, etc
<b>Employees</b>	
<b>Data Category</b>	<b>Source from which Data was Acquired</b>
<b>Identifying Information</b> Name, surname, all ID information, T.R. ID Number, nationality, marital status, birthdate, photocopy of ID card	1. provided by the employee. 2. acquired from hiring platforms such as kariyer.net, etc.
<b>Contact Information</b> Telephone number, postal address, e-mail address, registered electronic mail (KEP) address	1. provided by the employee. 2. acquired from hiring platforms such as kariyer.net, etc.
<b>Financial Information</b> detailed financial and salary information, list of premiums, any file and debt information pertaining to files on execution proceedings, findeks information* (credit rating, financial position report), banking details	1. banking information is provided by the employee. 2. Detailed financial and salary information, list of premiums, findeks information are generated or acquired by the company, information pertaining to files on execution proceedings are obtained through service of notice.
<b>Sensitive Personal Data</b> health insurance policies, doctor reports pertaining to any handicaps, health statement, doctor reports, existence of pregnancy, pregnancy report, any records of occupational illnesses, job entry health exam form, day-to-day health related complaints, any medications currently being used, clinical history, chest x-ray, hearing test, eye test, blood type, criminal record, any religious affiliation information included on the photocopy of the registry certificate (ID), biometric data for the purpose of controlling access	1. doctor reports, existence of pregnancy, records of occupational illnesses, day-to-day health related complaints, medications currently being used, clinical history, health tests, blood type, criminal record, religious affiliation, biometric data are provided by the employee. 2. Health insurance policies are provided by insurance companies while the job entry health exam is provided by the Workplace Doctor.
<b>Education Information</b> education level, photocopies of certifications and diplomas, training and skills, resume (CV)	1. provided by the employee. 2. acquired from hiring platforms such as kariyer.net, etc
<b>Visual and Audial Data</b> photograph, audio records of meetings held with customers, images from the closed circuit security camera feed	1. photographs are provided by the employee. 2. Audial records and security camera feeds are obtained from the relevant devices.
<b>Employee Performance and Career Progress Information</b> training participation forms, training hours and duration, exam results (if any), internal promotion assessment processes (English, general skills exams, personality inventory), reports on unethical behavior, personnel promotion file, tally and performance reports, meeting records, job entry date, weekly work hours (login-logout records)	1. data pertaining to training is acquired from the persons providing such training. Other information concerns performance management and is generated by the company.
<b>Information on Family and Relatives</b> family notification forms, copy of certified detailed identity registry records (birth certificate and ID information)	1. provided by the employee.
<b>Other</b> vehicle details, IP addresses and web browser history of the work computers used by employees, signature, hobbies, exit interview reports, discharge documentation, ledger on use of annual leave, job exit interview forms, Social Security (SGK)	1. vehicle details, signature, hobbies, discharge documentation are provided by the employee. 2. IP addresses and browsing history is acquired from the computer and software, Exit interview reports and forms, ledger on use of annual leave are generated by the

registration number, tax ID number, tax discount letter, [visitor information]	company. Social Security (SGK) registration number and tax discount letters are obtained from the agencies concerned.
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### Visitors

Data Category	Source from which Data was Acquired
<b>Identifying Information</b> Visitor's name, surname	1. provided by the visitor her/himself.
<b>Contact Information</b> Telephone, address, e-mail	1. provided by the visitor her/himself.
<b>Visual Data</b> closed circuit security camera feed images	1. obtained from closed circuit security camera feed.

### Employees of External Service Providers/Business Partners

Data Category	Source from which Data was Acquired
<b>Identifying Information</b> Name, surname, signature	1. provided by the employee of the external service provider/business partner her/himself.
<b>Contact Information</b> address details, telephone, address, e-mail	1. provided by the employee of the external service provider/business partner her/himself.
<b>Visual Data</b> closed circuit security camera feed images	1. obtained from closed circuit security camera feed.

### Customer/Natural Person Representatives of Potential Customers

Data Category	Source from which Data was Acquired
<b>Identifying Information</b> Name, surname	1. provided by the customer her/himself or her/his representatives.
<b>Contact Information</b> Telephone, e-mail addresses	1 provided by the customer, her/himself or her/his representatives.

### Employees of Suppliers/Subcontractors

Data Category	Source from which Data was Acquired
<b>Identifying information</b> name, surname, photocopy of registry certificate or TR ID, photocopy of driver's license	1. provided by the supplier or its representative.
<b>Contact Information</b> postal address, mobile telephone number	1. provided by the supplier or its representative.
<b>Financial Information</b> monthly salary receipts, insurance premium payment information	1. provided by the supplier or its representative.
<b>Sensitive Personal Data</b> criminal record, periodic job entry checkup form, porter checkup information (specific to employees of catering companies), psychotechnical certificate (report), any religious affiliation included on the photocopy of the registry certificate or TR ID and blood type information on the drivers license.	1. criminal record, photocopy of the registry certificate or TR ID, driver's license to be provided by the supplier or its representative. 2. periodic job-entry checkup form, porter checkup information and psychotechnical certificate to be provided by the Workplace Doctor

<b>Visual and Audial Data</b> images from the closed circuit security camera feed, photocopy of registry certificate or TR ID, and driver's license photograph	1. photocopy of the registry certificate or TR ID, driver's license to be provided by the supplier or its representative. 2. Security camera images are obtained from the closed circuit security cameras.
<b>Other</b> employment contracts, signature, work hours, photocopy of license, SRC2 (professional driver competency) certificate, ISG (workplace health and safety) training certificate, SGK (Social Security Administration) supplier job entry form	1. photocopy of the license, SRC2 (professional driver competency) certificate, ISG (workplace health and safety) training certificate, signature and job entry form are to be provided by the supplier or its representative. 2. employment contracts, work hours and training certificates are generated by the Company.
<b>Data of the Natural Person Supplier/Business Partner/External Service Provider and Natural Person Representative of a Legal Entity Supplier/Business Partner/External Service Provider</b>	
<b>Data Category</b>	<b>Source from Which Data was Acquired</b>
<b>Identifying Information</b> Name, surname, TR ID No, signature	1. provided by her/himself or her/his representatives.
<b>Contact information</b> Address, e-mail addresses, telephone	1. provided by her/himself or her/his representatives.
<b>Visual or Audial Data</b> closed circuit security camera feed images	1. obtained from closed circuit security camera feed
<b>Natural Person Supplier-Business Partner-External Service Provider Financial Information</b> tax ID numbers, bank account details	1. provided by her/himself or her/his representatives. 2. provided by her/himself or her/his representatives.

#### 4. Purpose of the Processing of Your Personal Data

FORMFLEKS A.Ş. may process personal data collected with regard to you in accordance with the fundamental principles set forth in the law and within the scope of the conditions specified in articles 5 and 6 of the law for the processing of personal data during the process of managing the personal data of data subjects for the purpose of performing its activities and ensuring the legal, technical, commercial and work safety of the company and concerned persons with whom the company has a business relationship.

#### 5. The Parties to Whom Your Personal Data is Transmitted and the Purpose of such Transmission

Personal data collected with regard to you may be transmitted by our Company to our shareholders, business partners, suppliers, legally competent public and private agencies and institutions under the scope of the "Purposes" listed above in accordance with the provisions of all relevant legislation, the fundamental principles set forth in the Law no 6698 and the conditions specified under articles 8 and 9 of the Law for the transmission of personal data.

#### 6. Method and Legal Reasons for Collecting Your Personal Data

FORMFLEKS A.Ş. may collect your personal data electronically by means of email, mobile applications, website, open internet sources, social media, telephone, SMS and call centers as well as physically by means of hand delivery or mail. Furthermore, as set forth in articles 5 and 6 of the Law, your personal data may be collected on the basis of the establishment and/or performance of a contract, the establishment, exercise and/or protection of a right, fulfillment of a legal obligation and legitimate legal reasons as well as your express consent, if granted by you.

Once the purpose requiring the processing of your data ceases to exist as per article 7/1 of the LPPD and/or once the mandatory time allotted for processing/storage of personal data has expired, your personal data shall be erased, destroyed or anonymized.

## 7. Your Rights as a Data Subject as listed under article 11 of the Law

We would like to inform you that as a data subject you possess the following rights under article 11 of the Law:

- To learn whether or not your personal data is being processed,
- To request information in relation to any personal data that has in fact been processed,
- To learn the purpose for which your personal data is being processed and whether or not these are being used in line with such purpose,
- To identify the third persons to whom your personal data is being transmitted either domestically or abroad,
- To request correction/rectification if the personal data being processed is erroneous or incomplete and to request that any such action taken within this context be notified to third persons to whom your personal data had been transmitted,
- To request the erasure or destruction of personal data if the personal data is no longer necessary for the purpose for which it was collected or otherwise processed even if such personal data had been processed in accordance with the provisions of the Law and other relevant legislation and to request that any such action taken within this context be notified to third persons to whom your personal data has been transmitted,
- To object to any result obtained contrary to your interests when the processed data has been analyzed exclusively through automated systems,
- To request damages if you suffer harm as a result of the unlawful processing of your personal data.

## 8. Circumstances where Personal Data may be Processed without Express Consent according to the LPPD

According to article 5 of the Law no 6698 on the Protection of Personal Data, your personal data may be processed without your express consent under the following circumstances:

- Circumstances expressly set out in the laws,
- In circumstances where the processing of your personal data is mandatory to preserve your life or physical integrity or the life or physical integrity of another person and it is physically impossible for you as the data subject to express your consent or your consent is not legally recognized as valid,
- Provided that it is directly linked to the establishment or performance of a contract, where it is necessary to process the personal data of the parties to the contract,
- Where it is mandatory in order to fulfill a legal obligation,
- Where you have included your personal data as part of the public domain,
- Where it is mandatory to process the data in order to establish, exercise or preserve a right,
- Where it is necessary to process the data for FORMFLEKS A.Ş.'s legitimate interests without prejudice to your fundamental rights and freedoms,
- Personal health data may be processed without the data subject's express consent by persons subject to maintaining confidentiality or competent institutions or agencies where necessary to preserve public health, to provide preventative medicine, medical diagnoses, treatment and care services, the planning and management of healthcare services and its funding.

You may submit your applications with regard to your above listed rights to our company by filling out the [FORMFLEKS A.Ş. Personal Data Protection Application Form](#) available at [www.formfleks.com.tr](http://www.formfleks.com.tr) Your requests will be finalized free of charge as quickly as possible depending on the nature of your request and at the latest within **30 (thirty) days**. However, in the event that the process requires additional costs, you may be charged based on the rates to be specified by the Personal Data Protection Board.