

INTRODUCTION

The Law No. 6698 on the Protection of Personal Data, published in the Official Gazette dated 07.04.2016, regulates the protection of fundamental rights and freedoms of individuals, especially the privacy of private life, in the processing of personal data, and the obligations of data supervisors who collect and process data, and the procedures and principles to which they are bound. "BetonstarMakine Sanayi veTicaret A.Ş. Personal Data Protection Policy" has been created to implement this law and its implementation regulations and the decisions of the Personal Data Board and to explain the duties and responsibilities of the government and Company employees.

Information on the Law on Protection of Personal Data

Your personal data that you will provide to our companies in your applications and contracts you will make to obtain information or services from our companies will be processed by the relevant units of our companies within the scope of the Law on Protection of Personal Data. Your personal data are processed by our companies within the scope of the purpose and procedure specified in the Personal Data Protection Law for purposes such as providing a healthy, fast, and efficient service during the legal relationship you will establish with our companies, making the necessary notifications safely and effectively, and establishing a healthy and safe relationship with you and your representatives during the contract process

Your personal data may be transferred to administrative and official authorities, direct and indirect shareholders of our companies and their domestic and foreign affiliates, our business partners, suppliers, domestic – foreign third parties from which support service or service is received by our companies, and independent audit companies due to legal obligations but only within the framework of legal limitations.

However, your personal data will be deleted or anonymized when the legal relationship between you and our companies ends. In addition, within the scope of the Law on Protection of Personal Data, real persons have the right to request information about the processing of their personal data, to learn the purpose of processing, to know the third parties to which they are transferred, to request the correction of errors in the data, if any, and to request deletion of the data if the conditions are met.

1. PURPOSE AND SCOPE

BetonstarMakine Sanayi veTicaret A.Ş. Personal Data Protection Policy has been created to be implemented in terms of the "COMPANY", managers, employees, and all persons who have a relationship with the COMPANY.

This Policy determines the rules and principles to ensure the privacy and immunity of private life rights of all real persons who have a relationship with the COMPANY and the protection of personal data protected by the Law. Any violation of the policy means that the COMPANY is in violation of the Law due to being a registered Data Supervisor. Therefore, any violation of BetonstarMakine Sanayi veTicaret A.Ş. Personal Data Protection Policy by the employees will be considered as a disciplinary violation.

2. DEFINITIONS

Within the scope of this POLICY and all documents and activities within the scope of Personal Data Protection Law;

- **Explicit consent** refers to the consent that is based on information and expressed with free will regarding a specific subject.
- **Anonymization** refers to the rendering of personal data that cannot be associated with an identified or identifiable real person under any circumstances, even by being matched with other data.
- **Related person** refers to the real person whose personal data is processed.
- **Personal data** refers to all kinds of information regarding an identified or identifiable real person.
- **Processing of personal data**, refers to all kinds of operations performed on the data such as the acquisition of personal data by fully or partially automated or non-automatic means provided that they are part of any data recording system, and recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying them or preventing their use.
- **Board** refers to the Personal Data Protection Board.
- **Data processor** refers to the real or legal person who processes personal data on data supervisor's behalf, based on the authority given by the data supervisor.
- **Data supervisor** refers to the real or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.

3. GENERAL PRINCIPLES

The personal data will only be processed in accordance with the procedures and principles stipulated by the Law. Basic principles in processing personal data are compliance with the law and good faith, being accurate and up-to-date when necessary, being processed for specific, explicit and legitimate purposes, being connected, limited and restrained to the purpose for which they are processed and being kept for the period stipulated in the relevant legislation or as required for the purpose for which they are processed.

4. COLLECTION AND PROCESSING OF PERSONAL DATA

The Company collects and processes personal data for the purposes of establishing business contracts, establishing relationships with customers, and concluding contracts. The reasons, processes, procedures, and all other technical details of the Company's personal data processing are specified in the "BetonstarMakine Sanayi ve Ticaret A.Ş. Personal Data Inventory".

5. EXPLICIT CONSENT IN THE PROCESSING OF PERSONAL DATA

Personal data cannot be processed without the explicit consent of the related person. Explicit consent must be in written or demonstrable form and must be obtained after the related person is informed about the collection, use, transfer, and destruction issues. However, the Company will be able to process personal data without explicit consent in the following cases:

- Conditions clearly stipulated in the laws,
- Cases where it is compulsory for the protection of the life or body integrity of the person or someone else who is unable to disclose his consent due to the actual impossibility or whose consent is not legally valid,
- Provided that it is directly related to the establishment or performance of a contract, a case where it is necessary to process personal data belonging to the parties to the contract,
- The case where it is mandatory for the data supervisor to fulfill his/her legal obligation,
- Cases where the personal information was made public by the relevant person,
- Cases where data processing is mandatory for the establishment, use or protection of a right,
- Cases where data processing is mandatory for the legitimate interests of the data supervisor, provided that the fundamental rights and freedoms of the related person are not harmed.

6. OBLIGATIONS OF THE DATA SUPERVISOR

Company or authorized person is obliged to give information about

- Identity of the data supervisor and its representative, if any,
- For what purpose personal data will be processed,
- To whom and for what purpose the processed personal data can be transferred,
- The method and legal reason for collecting personal data,

as the data supervisor during the acquisition of personal data to the related persons.

COMPANY as the data supervisor;

is obliged to take all necessary technical and administrative measures to ensure the appropriate level of security for purposes such as

- to prevent unlawful processing of personal data,
- to prevent unlawful access to personal data, and
- to ensure the protection of personal data.

7. PROCESSING PERSONAL DATA IN OUR COMPANY'S OPERATIONS AND COMMERCIAL PROCESSES

Commercial processes are defined as being a party to contracts including personnel service agreements with real and legal persons with whom the Company has legal relations during its activities, service procurement, supply, and sales contracts and the sales, installation and support services of the sales, logistics and service-based software of the products produced by the Company and of which all intellectual and industrial rights belong to itself:

- The personal data acquired by the Company during the establishment of service contracts are mandatory data to fulfill the requirements of the Labor Law and other relevant legislation. Likewise, the collection of personal data of employees to fulfill the legal obligations of the Employer is regulated by the Labor Law, Social Insurance and General Health Insurance Law, Occupational Health and Safety Law and implementation regulations. Therefore, it is considered that the collection, processing, and storage of personal data within the scope of the service contract are within the scope of the exception stipulated by the Law. Following the expiration of the service contract and the legal retention periods, in cases where the personnel do not have the express consent of the personnel to keep them for a longer period, periodic checks are carried out and the instructions for the deletion of the data have been issued and given to the relevant units.
- Personal data, which is mandatory for the establishment and execution of the contract, are collected and processed with the explicit consent of the relevant person, although they are counted within the exceptions stipulated by the law in the commercial contracts to which the Company is a party. In this context, the Company concludes additional protocols in addition to all contractor and supply contracts and having the force that will become an integral part of those contracts.
- Concrete pump production, sales, and support services are the main commercial activities of the Company. The Company concludes contracts that deal with the sale of the products it manufactures, and as a fundamental task it undertakes with these contracts, it ensures the production, sale, and delivery of custom-made products. In this process that spans more than one month, the personal data of the relevant project personnel are mutually delivered between the Company and the customer. The names of the personnel who will take part in the production and/or sales project are written in the contract and their consent is received for the sharing and transfer of their data. The liabilities of the Company for support services start within the scope of the contract after the sale. In all cases where access to personal data of the customer is in question within the scope of support services, the existence of consent within the scope of the Law is questioned. After the termination of the Sales or Support contracts, an instruction for the execution of the transaction has been created and given to the relevant units by

performing periodic controls for the destruction or anonymization of the relevant personal data.

8. RIGHTS OF THE PERSONAL DATA OWNER

The personal data owner has the following rights by applying to the data supervisor:

- To learn whether personal data is processed,
- If personal data has been processed, to request information regarding this,
- To learn the purpose of processing personal data and whether they are used appropriately for their purpose,
- To know the third parties to whom personal data are transferred domestically or abroad,
- To request correction of personal data in case of incomplete or incorrect processing,
- To request deletion or destruction of personal the data if there is a special quality personal data,
- To request notification of the transactions made to third parties to whom personal data have been transferred,
- To object to the occurrence of a result against the person himself by analyzing the processed data exclusively through automatic systems
- To request the compensation of the damage in case of damage due to the unlawful processing of personal data

9. TO WHOM AND FOR WHICH PURPOSE THE PROCESSED PERSONAL DATA CAN BE TRANSFERRED

Limited to the realization of the above-mentioned purposes, your collected personal data may be transferred to the Company's business partners, shareholders and affiliates for;

- To be able to fulfill the requirements of the services we provide to our customers in accordance with the requirements of the contract and technology, to improve our products and services,
- To record the identity, address and other necessary information on behalf of determining the transaction owner information within the scope of Law No. 6563 on the Regulation of Electronic Commerce, Regulation on Electronic Commerce Service Providers and Intermediary Service Providers published in the Official Gazette dated 26.08.2015 and numbered 29457 prepared on the basis of these regulations with the Law on the Protection of Consumers No.6502, Distance Contracts Regulation published in the Official Gazette dated 27.11.2014 and numbered 29188 and other relevant legislation,
- To arrange all the records and documents that are mandatory in the field of Banking and Electronic Payment, which will be the basis of payment systems, electronic contracts or

paper processing and to comply with the information storage, reporting and information obligations stipulated by the legislation and other authorities,

- To be able to provide information to public prosecutors, courts and relevant public officials on issues related to public security and legal disputes, upon request and as per legislation,
- The data will be processed in accordance with KVKK numbered 6698 and related secondary regulations; to inform about third parties or organizations to which your personal data can be transferred, persons and organizations related to the services offered such as persons/organizations, suppliers, cargo companies to whom your personal data you share with the Company for the above-mentioned purposes can be transferred, program partner organizations and domestic/foreign organizations that we cooperate with to carry out our activities and/or as Data Processors and other third parties,
- to send the messages we send to our customers to real or legal persons with whom we receive services and cooperate in product/service comparison, analysis, evaluation, advertisement and realization of the above-mentioned purposes and the program partner institutions and organizations we have contracted with, within the scope of the personal data processing conditions and purposes specified in the Articles 8 and 9 of the Law No.6698.

10. MEASURES TAKEN FOR THE PROTECTION OF PERSONAL DATA

While personal data are stored in the existing and secure physical and electronic environments within the Company, all possible and conceivable backup and protection measures are taken regarding the software work. The main activity of the Company is the production of concrete pumps. All data and records of this main activity are digital. Therefore, digital security constitutes one of the most important elements of the Company's daily and general business life.

In this context, the Company complies with general data security practices and receives IT support from competent and expert institutions and individuals. The Company also ensures that data is stored in a specially protected room for data security, and that this data is backed up with all physical automatic backup systems and cloud backup is made on foreign servers. The Company makes serious expenditures for this purpose.

The data are classified according to the degree of confidentiality and only data processors authorized by the Company for this purpose are allowed to access the data. And within this context;

- The institutions and servers that are supported on behalf of the Company Information Department ensure that virus protection and firewall software are up-to-date and uninterrupted in terms of protecting personal data.
- Company Administrative Affairs Unit provides physical files in lockers and safe.
- Company employees ensure the destruction of personal data whose purpose and expiration date has expired, in accordance with the trainings given to them on the Law

and the instructions given by the Company administration. Employees also sign the PDPL(Personal Data Protection Law) information form before they are hired by the Company.

11.PRINCIPLES ON THE DESTRUCTION OF PERSONAL DATA

- All kinds of destruction methods can be applied in the destruction of personal data. In the process of destroying data in any digital form, methods such as permanent deletion of files and unreadable corruption of digital data can be used.
- If there is no consent for the storage of the data in the event of the termination of the reason for the processing of personal data, the data must be destroyed or anonymized.
- Despite the existence of prior express consent, personal data must be destroyed or anonymized at the request of the person concerned.
- Destruction should be such that the data is made inaccessible and irreversible.
- The data controller is obliged to carry out the necessary audits or have them done to ensure the implementation of the provisions of this Law in his institution or organization.
- Data controllers and data processors cannot disclose the personal data they have learned to anyone in violation of the provisions of this Law and cannot use it for purposes other than processing. This obligation continues even after they leave the job.
- If the processed personal data is obtained by others through illegal means, the data controller shall notify the relevant person and the board as soon as possible. The Board, if necessary, may announce this situation on its website or by any other method it deems appropriate.

BETONSTAR MAKINA SAN. VE TICARET A.Ş

You can send an e-mail to info@betonstar.com for your applications via e-mail.

According to the nature of your request, information and documents must be provided to us completely and accurately. In case the requested information and documents are not provided properly, there may be problems in the full and qualified execution of the investigations to be made by the Company based on your request. In this case, the Company declares that it reserves its legal rights. For this reason, your application must be sent completely and containing the requested information and documents, depending on the nature of your request.

You can download the attached document, fill in your own content and contact us to make an application and get information under the PDPL. (Click to download the form)