

## ESALCO LOGISTICS AND INTERNATIONAL TRADE S.A.

### CLARIFICATION TEXT ON BUSINESS PRACTICES CONCERNING THE LAW ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

Law n ° 6698 on the protection of personal data ("KVKK") entered into force on April 7, 2016 and includes the regulations concerning the processing of all kinds of information on "identifiable or (" Policy "and / or "Clarification text"). As part of this policy for the protection and processing of personal data; your personal data communicated to ESALCO LOGISTIQUE ET COMMERCE INTERNATIONALE SA (Esalco "and / or our company and / or" data controller ") belonging to real people in the categories listed below, which are obtained by the persons concerned during the use of the means provided by our company and / or specified by various means and / or specified by the KVKK and related legislation on personal data, the statements and explanations of our company regarding how they are processed and how they will be processed, as well as the procedures and principles concerning the use of said data are presented below. In this context, the scope of the Policy is the processing of personal data belonging to the owners of the data below.

- Our clients
- Our potential customers
- Our former employees / retirees
- Our shareholder partners, civil servants, our employees
- Supplier shareholders, authorities, employees
- Employees and intern candidates
- Partner candidates
- Supplier candidates
- Visitors
- The press
- Third parties. This category may be updated from time to time to adapt to changing conditions, policy, and relevant legislation.

a) Responsible and representative of data your personal data may be processed by our company within the framework of law n ° 6698 on the protection of personal data ("law"). As part of the KVKK, Esalco is accepted as data controller.

b) Purpose of the processing of your personal data Your personal data is processed by Esalco in accordance with the purposes and conditions related to the processing of personal data listed in Articles 5 and 6 of the KVKK, in order to provide logistics service activities more efficiently. Our objectives in the processing of your personal data are the planning and / or execution of Esalco's commercial and / or commercial strategies and the provision of legal, commercial and technical security and the continuity of the activities of Esalco or its business partners, fulfilling our legal obligations and using our rights under the applicable legislation, form part of the management of human resources and employment policies of Esalco. All necessary technical and administrative measures are taken to prevent your personal data from being processed or accessed illegally, and to ensure the security of your personal data.

c) Persons for sharing your personal data and purposes for sharing your personal data: they will be shared with shareholders, suppliers, Esalco business partners in countries and abroad and the public legally authorized the conditions of processing of personal data governed by articles 8 and 9 of the law with its institutions and organizations may be shared provided that they are used for the purpose of transfer, limited and measured. The necessary security measures are taken when sharing your personal data. Esalco may process and share data with third parties in accordance with Articles 5 and 8 of the KVKK and / or in the event of exceptions in applicable law. The main of these situations are listed below:

- Situations where this is clearly prescribed by law,
- Situations where it is mandatory to protect the life or integrity of the person or someone else who is unable to explain their consent due to real impossibility or whose legal consent is not given,
- Situations where the processing of personal data is necessary, provided that it is directly linked to the conclusion or performance of a contract, including that of the data subject,
- Situations where it is mandatory for the company to fulfill its legal obligations,
- Situations where the interested party has been made public by himself,
- Situations where data processing is mandatory for the creation, use or protection of a right,
- Situations where the processing of data is compulsory in the legitimate interest of the Company, provided that it does not affect the fundamental rights and freedoms of the data subject.

d) Methods of collecting your personal data and their legal grounds in order to continue its activities: Esalco collects your personal data through various channels such as surveys, websites, Esalco representatives and the like and for different legal reasons, in accordance with the conditions set out in articles 5 and 6 of the law. As provided in Esalco KVKK, when acquiring personal data, it informs the holders of personal data of the purpose of the processing of personal data as the controller, to whom and for what purposes it can transfer the personal data processed, the method of collecting personal data and the rights of the data owner. If a process requires obtaining express consent in accordance with KVKK, express consent is obtained from the data owners after the above information has been provided by our company.

e) Within the framework of your rights listed in article 11 of the law on your personal data, if you, as owners of personal data, submit your requests concerning your rights to our company by the methods set out in the law, our company will complete the request free of charge as soon as possible and within thirty (30) days at the latest. However, if the transaction requires an additional cost, the costs determined by our company by the Personal Data Protection Council will be invoiced. In this context, the owners of personal data have the following rights: 1. Learn if personal data is processed, 2. Request information if their personal data is processed. 3. Learn the purpose of the use of personal data processed and if the use is in accordance with their purpose, 4. Knowing the

third parties to whom the data is transferred in the country or abroad, 5. Requesting the correction of personal data in the event of missing or incorrect processing, 6. Requesting the deletion or destruction of personal data in accordance with the conditions stipulated in accordance with KVKK. to notify, 8. Oppose the emergence of a result against the person by analyzing the data processed exclusively by automated systems, 9. Request compensation in the event of damage due to the illegal processing of personal data. In order to use your rights mentioned above, you must inform our company in writing as soon as possible, in accordance with article 13 of the KVKK. The notifications which will be made to our company must be made in accordance with article 5 of the press release on the procedures and principles of application to the official, by registered mail in writing or by registered mail, the address of registered electronic mail (REM) , the secure electronic signature, the mobile signature, can transmit using the e-mail address registered in the system. Under article 4 of the same press release, data subjects are obliged to submit their requests in Turkish under these rights. In this regard, you can send the signed copy of the form to the address indicated in the form by filling out the request form from the data owner on [www.esalco.com](http://www.esalco.com). The person concerned undertakes that the information on the form in question is complete, correct and up to date, and in the event of modification of this information, they will update it immediately. Our company will not be liable if the person concerned has not provided up-to-date information. Our company may request information from the data subject to determine if the requester has personal data, and may ask the owner of the personal data a question regarding their request to clarify the issues specified in the request. If your application is assessed negatively, our reasoned refusal letter will be sent to the address you indicated in the application as soon as possible and within thirty days at the latest. However, if the transactions require a cost, it is possible to request a commission from the Personal Data Protection Council at the price determined in accordance with article 13 of the Personal Data Protection Law. Esalco will retain the personal data it has obtained under the conditions set out in this notification and the agreement concluded with persons linked to the benefit of the services in the best possible way and for the period necessary to fulfill the obligations arising from the nature of the agreement. In addition, Esalco may store personal data in the event of a dispute which may arise from the contract, limited to the performance of administrative and legal procedures in the context of the dispute, and during the limitation period fixed in accordance with applicable law. Our company determines in all cases the retention periods in the light of legal obligations and expiration periods and keeps them for the duration of the services provided. Or fulfill its obligations under article 12 of the anonymization regulations, if applicable. If new application methods are determined by the Personal Data Protection Council, these methods will be announced by Esalco.

f) Within the framework of our data security guarantees and commitments, Esalco takes reasonable technical and administrative measures to prevent the risks of unauthorized access, accidental loss of data, deliberate deletion or damage to ensure security. personal data. Esalco, in accordance with the conditions set out in the relevant legislation or expressed in this clarification text, personal data is not processed unlawfully, personal data is not illegally

accessed, the necessary technical and administrative measures are taken to ensure the level of security appropriate to ensure the protection of personal data, the necessary audits. Esalco may not disclose the personal data it has obtained on the persons concerned to anyone in violation of this clarification text and the provisions of KVKK and use it for purposes other than processing.

g) Modifications: Esalco may modify the provisions of this clarification text at any time by publishing it on its website and application. Esalco may unilaterally modify the notification provisions in the context of legislative obligations likely to change. The notification provisions made by Esalco come into force on the date of their publication.

For your information.