ONPO Madencilik İnş. San. Tic. A.Ş.

Personal Data Processing Clarification Text

ABOUT THE DATA CONTROLLER

Title :ONPO Madencilik İnş. San. Tic. A.Ş.

Address : Zübeyde Hanım Mah. Turgut Özal Bulv. No: 6/2 Altındağ/ Ankara

**Phone :** 0 312 384 30 97

As **ONPO Madencilik İnş. San. Tic. A.Ş** (“Company”), we show maximum sensitivity to the security of your personal data. With this awareness, as the Company, we attach great importance to the processing and preservation of all kinds of personal data belonging to all persons associated with the Company, including those who benefit from our products and services, in accordance with the Personal Data Protection Law No. 6698 (“**PDP Law**”) and to transfer them in accordance with the law. With the full realization of this responsibility, we process your personal data as “Data Controller” within the scope of our commercial relations or within the scope of our business relationship with you in accordance with the law and the rule of honesty, within the framework of the purpose that requires their processing and within the framework of the conditions and limits stipulated by the law by maintaining the accuracy and the most up-to-date version of the personal data as you have notified us or as notified to us in a limited and measured manner in connection with this purpose.

1. Collection, Processing and Processing Purposes of Personal Data

Your personal data may vary depending on the service, product or commercial activity provided by our Company; when you visit our Company or our website by automatic or non-automatic methods, it may be collected verbally, in writing or electronically through social media channels, your participation in our activities, all our activities and similar means. As long as you benefit from our company's products and services, your personal data can be processed up-to-date.

Collected personal data will be processed for purposes of;

* + Our business units can carry out the necessary works to benefit you from the products and services offered by our hotel,
	+ Customizing the services offered by our company according to your needs and demands and recommending them to you,
	+ Ensuring the legal and commercial security of our Company and natural and legal persons who have a business relationship with our Company (to carry out business partner/customer/supplier (authorized or employees) risk management and evaluation processes, to carry out legal compliance processes, to follow up financial affairs, etc.),
	+ In line with the purpose of determining and implementing our company's commercial and business strategies;
	+ In line with the purpose of ensuring the execution of our Company's human resources policies;
	+ Fulfilling our obligations arising from the legislation to which our Company is subject, such as the relevant PPD Law and secondary legislation,
	+ Fulfillment of information and reporting obligations if requested by official and/or administrative authorities,
	+ Audit of its activities by the relevant institutions,
	+ Conducting business activities in compliance with legislation
	+ Maintaining relations with public institutions and organizations and other organizations,
	+ Planning and execution of corporate sustainability, corporate governance, strategic planning and information security processes,
	+ Execution of Supply Chain Management Processes
	+ Conducting financial operations and following up financial issues and conducting sponsorship activities,
	+ Carrying out business partnership, purchasing, tender and sales transactions and after-sales support services to customers,
	+ Execution of Goods/Service Production and Operation Processes
	+ Conducting customer relationship management processes and following up requests and complaints,
	+ Conducting marketing analysis studies and marketing processes,
	+ Advertising/ Campaign/ Promotion Processes,
	+ Execution of Social Responsibility Events and Civil Society Activities
	+ To monitor demands and complaints,
	+ The necessary works can be carried out by our relevant business units in order to benefit from the products and services of real and/or legal third parties, institutions and organizations (employee candidates, employees, visitors, suppliers, business partners, etc.) that have a relationship with the company,
	+ Ensuring the life and property security and legal, commercial and occupational health security of real and/or legal third party institutions and organizations in which the Company's business is carried out or in the headquarters and units of the Company,
	+ Turkish Commercial Code No. 6102, Turkish Code of Obligations No. 6098, Law No. 6502 on the Protection of Consumers, Law No. 6698 on the Protection of Personal Data, Regulation on the Processing of Personal Health Data and Protection of Privacy, carrying out inspection and/or regulation tasks to be carried out by authorized and authorized public institutions and organizations and professional organizations in the nature of public institutions,
	+ Fulfillment of requests for information and documents requested by judicial bodies and/or administrative authorities,
	+ Listing, reporting and verification analysis of the use of the products and services offered in our Company and all centers and units affiliated to our Company, producing statistical and scientific information in this regard, developing our products and services accordingly, increasing satisfaction with our products and services and making customizations for the user in this context,
	+ Training and development of all employees,
	+ Fulfillment of rights and obligations such as offers, promotions, exemptions etc. offered by contracted private insurance companies and/or other institutions within the framework of agreements,
	+ To take necessary technical and administrative measures within the scope of data security,
	+ Protecting public order and health and providing information to authorized persons, institutions and organizations,
	+ Storage & archiving activities,

and in Articles 5 and 6 of the PPD Law, it is stated that personal data cannot be processed without the explicit consent of the person concerned. However, within the scope of the legislation, processing activities are carried out without seeking the explicit consent of the relevant person in line with the following processing conditions:

* Existence of explicit consent,
* The processing is explicitly set forth in the law
* Personal data processing of the parties to the contract is required, provided that it is directly related to entering into or executing a contract
* Data processing is essential for the data controller to fulfill their legal obligations
* In the event that data processing is obligatory for the establishment, use or protection of a right,
* Provided that it does not harm the fundamental rights and freedoms of the relevant person, it is an obligation to process data for legitimate interests of the data controller.
1. To Whom and What Purpose the Processed Personal Data Can be Transferred

Limited to the above-mentioned personal data processing conditions and purposes, your collected personal data may be transferred to our business partners, group companies and shareholders, authorized public institutions as required by legal obligation and our domestic institutions and solution partners with whom we are contracted as required by our activities, lawyers or attorney partnerships, mediators, conciliators, accountants, CPA and private law real and legal persons in accordance with Article 8 of the PDP Law.

However, personal data processed for the purpose of carrying out our business activities may be transferred abroad by our company within the scope of your explicit consent in accordance with Article 9 of the PDP Law with companies with which we have commercial relations abroad.

In addition, your personal data is processed for the period required by our activities and the legislation we are subject to and related secondary regulations within the framework of our policies and procedures determined in accordance with the Regulation on Deletion, Destruction or Anonymization of Personal Data, and is deleted when there is no reasonable or legal requirement or compliance .

# Method & Legal Cause of Personal Data Collection

Your personal data; In all kinds of verbal, written or electronic media, in line with the above-mentioned purposes, it is obtained in order to provide the products and services offered by our Company within the legal framework determined and to fulfill the obligations arising from the contracts to which our Company is a party and the legislation we are subject to and the secondary regulations in a complete and accurate manner. Your personal data collected for this legal reason can be processed and transferred in accordance with Articles (1) and (2) of this text within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the PDP Law. In this context, the following categorical data are collected as personal data;

**Identity:** It is the data group containing information about the identity of the person.

Name, Surname, T.R. ID No., Tax ID No, Signature, etc.

**Communication:** It is the data group that can be used to reach the person.

Telephone Number, E-Mail Address, Supplier Information (Name, Title, Tax No., E-Mail Address, etc.), Business Address, Delivery Address, etc.

**Legal Action:** It is the category of data that includes data types such as information in correspondence with judicial authorities, information in the case file.

Benefit and Benefits Information, Legal Action and Compliance Information, Request/Complaint Management Information, etc.

**Customer Transaction**: Call center records, Invoice, Bill, Promissory Note, Check information, Information in box office receipts, Order information, Request information, etc.

Physical Space Security: Entry-exit registration information of employees and visitors, camera records is a data category that includes data types such as

**Transaction Security:** It is the data category containing data types such as IP address information, website login-exit information, password and password information.

Security Keys, Password, Usernames, E-signature, Session Keys Information, Encryption Method, Cookie Information (For Transaction Security Information) etc.

**Risk Management**: Information processed to manage commercial, technical, administrative risks, etc.

**Finance**: It is the data group containing the financial information of the person. Bank Account No., IBAN, Check and Bill amounts,

**Marketing** -Shopping history information -Survey -Cookery records -Campaigning information received

**Visual and Auditory Records:** It is the data group containing the visual and auditory data of the person. Camera Records

# Data Processing Time and Retention Period

Your personal data, limited to the purposes specified in this Clarification Text; Data processing and statute of limitations in secondary regulations related to all relevant laws and legislation to which our Company and its affiliated headquarters and units are subject,

will be processed in accordance with their duration. In case of changes in the laws regarding the data processing periods, the new periods determined shall be taken as basis.

As a requirement of the principle of purpose limitation, your personal data is processed for a limited period of time that requires the fulfillment of the purposes described in this Clarification Text and in any case, it is processed in accordance with the practices of the company and the practices of commercial life, and after the expiration of the periods, it is deleted, destroyed or anonymized. The procedures and principles related to this are specified in the Personal Data Storage, Destruction and Anonymization Policy.

1. Rights of Personal Data Owner listed in article 11 of PPD Law:

As personal data owners, our company will conclude your requests for your rights free of charge within 30 days at the latest, depending on the nature of the request, if you submit your requests to our company using the methods set out below. However, if a fee is stipulated by the Personal Data Protection Board, the fee in the tariff determined by our Company will be charged.

The persons whose personal data are processed have the following rights:

1. To learn whether personal data is being processed,
2. Request information if their personal data has been processed,
3. to learn the purpose of processing personal data and whether they are used in line with their purpose,
4. To know the third parties to whom personal data are transferred domestically or abroad,
5. To request correction of the personal data processed incompletely or inaccurately and to request the provision of the information on the transaction performed under this scope to the third parties to whom the personal data are transferred,
6. Where reasons for processing personal data are disappeared, although these were processed in accordance with the provisions of PDP Law and other related laws, to request the deletion or destruction of her/his personal data and to request the provision of the information on the transaction performed under this context to third parties to whom such personal data are transferred,
7. To object to this result in the event of a result against the person himself by analyzing the processed data exclusively through automated systems,
8. In case of damage due to unlawful processing of personal data, it has the right to demand the compensation of the damage.

In accordance with Paragraph 1 of Article 13 of PDPK, you can submit your requests to our company for using your above mentioned rights in written or through other methods determined by Personal Data Protection Committee. In accordance with the PPD Law, you must submit your application to our Company in writing.

# Exercising the Rights of the Person Concerned

Relevant persons whose personal data is processed will be able to fill in and sign the **"Application Form"** with the information and documents that will determine their rights and identities specified in the clarification text and with the methods specified below or other methods determined by the Personal Data Protection Board and send it to our Company free of charge.

Relevant Person

* + after filling out the personal data application form at <https://www.onpo.com.tr/> or preparing a duly petition, by sending a copy by hand or in writing by registered mail or by applying in person,
	+ after filling out the personal data application form at <https://www.onpo.com.tr/> and signing it with a "secure electronic signature" within the scope of the Electronic Signature Law No. 5070, sending the secure electronic signature form by e-mail registered to the address, using the secure electronic signature, mobile signature or the e-mail address previously notified to the Company by the relevant person and registered in the Company's system or by applying through a software or application developed for the purpose of application,

will be able to apply to the data controller.

In order for the above-mentioned application to be accepted as a valid application, in accordance with the Communiqué on Application Procedures to the Data Controller, the person concerned must specify the following matters;

1. Name, surname and signature, if application is written,
2. TR identification number for Turkish Citizens and nationality, passport number or identification number for foreigners,
3. Residential address or workplace address for notification,
4. E-mail address, telephone and fax number, if any, for notices,
5. Subject of Request,

- Otherwise, the application will not be considered as a valid application.

In the applications to be made without filling the application form, the above-mentioned issues must be submitted to the Company in full.

In addition, in order for third parties to make an application request on behalf of the data subjects whose personal data are processed, a special power of attorney must be issued by the data subject through a notary public on behalf of the person who will make the application.