

PRIVACY NOTICE

As **Akış Asansör Makine Motor Döküm San. Tic. Ltd. Şti.** (“**Akış Asansör**” or the “**Company**”), we exercise the utmost care in protecting personal data. To ensure that your personal data is collected, stored and shared lawfully, and to protect your privacy, Akış Asansör takes the highest level of security measures possible under the applicable legislation. In recognition of this responsibility, we process your personal data as described below, in our capacity as a data controller under Law No. 6698.

1. Identity of the Data Controller and Its Representative

The circumstances under which your personal data may be processed by Akış Asansör Makine Motor Döküm San. Tic. Ltd. Şti., as the data controller pursuant to Article 10 of the Personal Data Protection Law No. 6698 (“**KVKK**”), are explained below.

2. Purposes of Processing Personal Data

In accordance with the fundamental principles prescribed by law, Akış Asansör may process the personal data it collects for the following purposes:

- Carrying out the work required by the Company’s business units to conduct **Akış Asansör’s** commercial activities in accordance with legislation and Company policies;
- Determining and implementing **Akış Asansör’s** human resources policies and activities;
- Determining, planning and implementing **Akış Asansör’s** short-, medium- and long-term commercial policies;
- Ensuring the commercial, technical and legal security of persons and entities with which **Akış Asansör** has a business relationship, and communicating with them;
- Protecting **Akış Asansör’s** commercial reputation and the trust it has established;
- Complying with recordkeeping, reporting and notification requirements imposed by public authorities under the applicable legislation, and fulfilling our legal obligations relating to those requirements;
- Managing financial operations, communications, market research and social responsibility activities, procurement operations (requests, quotations, evaluations, orders and budgeting), internal systems and applications, and legal operations for the purpose of determining and implementing the Company’s commercial and business strategies;
- Reviewing, evaluating and responding to requests from public authorities or relevant persons;
- Ensuring the security and monitoring of the Company’s premises through camera recordings and other systems;
- Preserving evidence to meet the burden of proof in legal disputes that may arise in the future;
- Processing personal data within the conditions and purposes set out in Articles 5 and 6 of the KVKK; and
- Classifying your data through automated decision-making for the processing of work and information required as part of our activities. This is necessary for reports to be prepared and documents to be submitted to relevant organizations.

The processing of your personal data is necessary for legal and contractual reasons. If you do not provide your data, it may become impossible to conduct commercial activities with persons and entities that have a business relationship with the Company, make legally required notifications,

fulfil legal obligations, carry out human resources activities, and ensure legal, technical and commercial security.

3. Recipients and Purposes of Data Transfers / Transfers Abroad

Provided that transfers are limited to the purposes listed above, **Akış Asansör** may transfer personal data under Articles 8 and 9 of the KVKK to:

- **Akış Asansör's** business partners and affiliates;
- Persons and organizations to whom transfers are permitted under the Turkish Commercial Code, the Turkish Code of Obligations, the Labour Law and other applicable legislation;
- Legally authorized institutions and organizations, administrative and judicial authorities, and institutions, organizations, persons and companies designated by specific legislation; and
- Individuals and legal entities from which we obtain products or services or with which we cooperate.

Where data is transferred to an institution or business in Türkiye, its compliance with the KVKK and its data security measures will also be checked.

Under Article 9 of the Law, your personal data may be transferred abroad where:

- The data subject has given explicit consent;
- In the case of a transfer to a country providing adequate protection (a country deemed safe by the Board), the conditions specified in the Law are met, namely those set out in Article 5(2) and Article 6(3); or
- In the case of a transfer to a country that does not provide adequate protection, the conditions specified in Article 5(2) and Article 6(3) are met, adequate protection is guaranteed in writing, and permission is obtained from the Board.

The Personal Data Protection Board will announce the countries it considers safe.

4. Method and Legal Basis for Collecting Personal Data

The Company collects your personal data through various channels—verbally, in writing and electronically—to carry out its activities. Collection is based on the legal grounds of compliance with legislation and Company policies, performance of contracts, express provision by law, and the Company's legitimate interests.

In accordance with the fundamental principles prescribed by the KVKK, your personal data may also be processed and transferred for the purposes stated in this Privacy Notice, within the conditions and purposes for processing personal data set out in Articles 5 and 6 of the KVKK.

5. Retention Period for Personal Data

Your personal data is retained for the period prescribed by applicable legislation or for as long as necessary for the purpose for which it is processed. The following criteria are considered when determining the maximum retention period:

- The period generally accepted in the data controller's sector for the purpose of processing the relevant category of data;
- The duration of the legal relationship established with the data subject that requires the processing of personal data in the relevant category;

- The period during which the data controller's legitimate interest associated with the purpose of processing remains valid in accordance with the law and the principle of good faith;
- The period during which the risks, costs and liabilities arising from retaining the relevant category of data continue to exist under the law;
- Whether the proposed maximum period allows the relevant category of data to be kept accurate and, where necessary, up to date;
- The period for which the data controller is legally obliged to retain personal data in the relevant category; and
- The limitation period applicable to the exercise of a right relating to the personal data in the relevant category.

6. Rights of Data Subjects Under Article 11 of Law No. 6698

If you submit a request concerning your rights to Akış Asansör using the methods set out in the Personal Data Protection and Processing Policy of Akış Asansör Makine Motor Döküm San. Tic. Ltd. Şti., published at akisasansor.com.tr, our Company will respond as soon as possible and, in any event, within thirty days, depending on the nature of the request. If processing the request entails an additional cost, Akış Asansör may charge the fee specified in the tariff set by the Personal Data Protection Board.

As a data subject, you have the right to:

- Learn whether your personal data is being processed;
- Request information if your personal data has been processed;
- Learn the purpose of processing your personal data and whether it is being used for that purpose;
- Know the third parties in Türkiye or abroad to whom your personal data has been transferred;
- Request the correction of incomplete or inaccurate personal data and request that third parties to whom the data has been transferred be notified of the correction;
- Request the deletion or destruction of personal data when the reasons requiring its processing no longer exist, even if it was processed in accordance with the KVKK and other applicable laws, and request that third parties to whom the data has been transferred be notified accordingly;
- Object to a result arising against you through the analysis of processed data exclusively by automated systems; and
- Request compensation if you suffer damage due to the unlawful processing of your personal data.

If your application is rejected, you find the response insufficient, or no response is provided within the required period, you may lodge a complaint with the Personal Data Protection Board within thirty days of receiving the data controller's response and, in any event, within sixty days of submitting your application. Under Article 13 of the Law, a complaint cannot be lodged before the application procedure has been exhausted.

Under international legislation, in addition to the rights listed above, the data subject also has the right to request a restriction on the processing of their personal data and to withdraw consent to the processing or transfer of their personal data.

You may exercise the rights listed above by using the Data Controller Application Form available at akisasansor.com.tr.