

## **INFORMATION TEXT ON THE PROTECTION OF PERSONAL DATA**

### **1. Data Responsible**

This clarification text has been prepared by Filpa Ambalaj ve Dis Ticaret A.S. H. Sabancı Organized Industrial Zone OSB Sabancı Caddesi No: 8/2 Sarıçam/Adana, Mersis No. : 0388031285100010, Tel: 90 322 394 36 27, e-mail: [info@filpa.com.tr](mailto:info@filpa.com.tr)), as data controller, for you, our visitors, customers, suppliers, business contacts, related persons with whom we have commercial or business relations within the scope of Article 10 of the Personal Data Protection Law No. 6698 and the Communiqué on the Procedures and Principles to be Complied with in Fulfilling the Obligation to Clarify.

All personal data shared with our company can be processed in accordance with the law, in connection with our activity and service purposes and in a reasonable manner. Details within the scope of the clarification text can be accessed from the Personal Data Protection and Processing Policy on our website.

### **2. Definitions**

Personal Data	Any information relating to an identified or identifiable real person.
Processing Personal Data	All kinds of operations performed on the data, such as obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying, blocking or using personal data completely or partially automatic or non-automatic means provided that it is a part of any data recording system.
Recipient Group	The category of real or legal person to whom personal data is transferred by the data controller.
Data Subject	The real person whose personal data is processed
Data recording system	Any environment where personal data is processed wholly or partially automatically or by non-automatic means provided that it is a part of any data recording system,
Data Responsible	It refers to the natural 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. Personal Data and Purpose of Processing Personal Data**

Below are your personal data which you share with us when necessary may be subject to processing:

Data category	Personal Data
Identification Data	Your name, surname, ID no, signature, etc
Contact Data	Addressi email address, telephone no, etc.
Customer Process	Invoice, note, check information, Order information, Request information, etc.
Physical Space Security	Check-in Check-out registration information, Camera Records, etc.
Process Security	IP address information, website login and logout information, password information, etc.

Finance	Bank Account Information etc.
Professional experience	Title, Diploma information, Courses attended, In-service training information, Certificates etc.
Personnel	Company Information, Title Information, etc.
Family Members and Relatives information	degree of affinity etc.
Health Data	Information on disability status, Blood group information, Personal health information, Device and prosthesis information used, etc.
Criminal Conviction and Security Measures	Criminal record

Our company processes your personal data for the purposes listed below:

Your Personal Data; All processes will be handled in accordance with the processing conditions of personal data specified in Articles 5 and 6 of KVKK for the purposes of Creation and Tracking of Visitor Records, Ensuring Physical Space Security, Execution of Emergency Management Processes, Execution of Information Security Processes, Execution of Risk Management Processes, Ensuring the Security of Movable Property and Resources, Ensuring the Security of Data Controller Operations, Execution of Audit / Ethical Activities, Internal Audit / Investigation / Execution of Intelligence Activities, Providing Information to Authorized Persons, Institutions and Organizations, Execution of Contract Processes, Execution of Communication Activities, Execution / Supervision of Business Activities, Execution of Logistics Activities, Execution of Strategic Planning Activities, Following Supply Chain Management Processes, Execution of Investment Processes, Execution of Management Activities , Execution of Customer Relationship Management Processes, Execution of Activities for Customer Satisfaction, Organization and Event Management, Execution of Marketing Analysis Studies, Advertising / Campaign / Execution of Promotion Processes, Execution of Activities in Compliance with the Legislation, Execution of Access Authorizations, Follow-up and Execution of Legal Affairs, Execution of Storage and Archive Activities, Execution of Finance and Accounting Works, Execution of Business Continuity Activities, Execution of Goods / Services Purchasing Processes, Goods / Services Sales Execution of the Processes, Execution of Goods / Services After-Sales Support Services, Execution of Goods / Services Production and Operation Processes, Execution of Marketing Processes of Products / Services.

#### **4. Transfer of Personal Data**

Our company acts in accordance with the regulations stipulated in the KVKK regarding the transfer of personal data. Your personal data can be transferred within the framework of the procedures and principles stipulated in the relevant legislation and in accordance with the conditions and purposes of transferring personal data specified in Articles 8 and 9 of the KVKK to Institutions or organizations permitted by Law on the Regulation of Broadcasts on the Internet and Combating Crimes Committed Through These Broadcasts, Turkish Commercial Law, Tax Procedure Law, the Law on the Protection of Personal Data No. 6698 and other legislation; Personal Data Protection Authority, Ministry of Finance, Ministry of Customs and Trade, Ministry of Labor and Social Security, Public legal entities such as the Ministry of Customs and Trade, the Ministry of Labor and Social Security, Information Technologies and Communications Authority; Real or private legal entities, from whom we receive contractual services, cooperate with us to carry out our activities, are responsible for taking data security

measures, such as the protection of all kinds of personal data, the prevention of unauthorized access and unlawful processing; our group companies; our shareholders; institutions and companies where our company receives Legal, Tax Financial, Bank, etc. Services.

Personal data can be transferred abroad in case personal data is necessary for the performance of the employment contract and in other cases stipulated in the law, provided there is sufficient protection in the foreign country to which it will be transferred, in case there is not sufficient protection, the data controllers in Turkey and the relevant foreign country must undertake in writing to provide adequate protection and comply with the law numbered 6698 and the relevant legislation.

## **5. Collection Method and Legal Reason of Personal Data**

Personal data can be obtained by non-automatic methods provided that they are part of a data recording system through documents, forms, reports, etc. submitted to us by our visitors, customers, suppliers, business contacts, and related persons during the establishment and execution of the business relationship. Moreover, your personal data may be obtained or collected through automatic or partially automated systems.

Legal reasons for the processing of your personal data by the Company;

Clearly stipulated in the law, directly related to the establishment or performance of the contract, when it is mandatory to process the personal data of the parties of the contract, to fulfill our Company's legal obligations, Data processing is mandatory for the establishment, exercise or protection of a right, Data processing is mandatory for the legitimate interests of our company, provided that it does not harm your fundamental rights and freedoms, In cases other than the legal reasons above, your personal data is collected and processed by our Company for the purposes specified in this clarification text, based on the legal reasons for your explicit consent.

## **6. Rights of the Relevant Person**

You, as a Relevant Person, have the following rights in accordance with Article 11 of the Law.

Learning whether your personal data is processed, Requesting information if your personal data has been processed, Learning the purpose of processing your personal data and whether your personal data is used in accordance with the purpose of processing, Knowing the third parties to whom your personal data has been transferred, incomplete or incorrect processing of your personal data, Requesting their correction, if any, Demanding the deletion or destruction of your personal data within the framework of the conditions stipulated in the relevant legislation, Requesting notification of the correction, deletion and destruction processes made in accordance with the relevant legislation to the third parties with whom your personal data has been shared, You have the right to object to the emergence of a result against you by analyzing your processed personal data exclusively through automated systems, and to demand the removal of the damage in case you suffer damage due to unlawful processing of your personal data.

You can submit your applications regarding your rights listed above to our Company by filling out the Related Person Application Form, which you can access on our website. You may submit your requests regarding your aforementioned rights in writing to our company's H. Sabancı Organized Industrial Zone OSB Sabancı Caddesi No: 8/2 Sariçam/Adana address as the relevant person, to filpa@hs03.kep.tr with secure electronic signature, mobile signature or If any, secure electronic signature, mobile signature to info@filpa.com.tr via the e-mail address you have previously notified to our Company and registered in our company's system, or, if

available, via the e-mail address you have previously notified to our Company and registered in our company's system to [info@filpa.com.tr](mailto:info@filpa.com.tr) address and your submissions will be evaluated and finalized within 30 (thirty) days. In the requests submitted by the Relevant Person, it is mandatory to have the name, surname, signature if the application is in writing, TR identity number or nationality if it is a foreigner, passport number or identity number, if any, place of residence or work address for notification, e-mail address, if any, subject to notification, telephone and fax number and the subject of the request.

If a written response is to be given to the requests, the right to charge a fee based on the fee schedule stipulated by the legislation is reserved. If the response to the application is given in a recording medium such as a CD or flash memory, our Company may charge the requesting data owner a fee equal to the cost of the recording medium.

### **Changes in Text**

Our company may change the provisions of this text at any time. The provisions made by our company take effect on the date of publication.