

CORPORATE GENERAL CLARIFICATION TEXT ON PROCESSING OF PERSONAL DATA

As Comita Razvoj Projektiranje Proizvodnja In Inzeniring D.O.O. Merkezi Slovenya İstanbul Merkez Şubesi ("Comita") we have prepared this clarification text in order to inform you, our Visitors, Online Visitors, Customers, Potential Customers, Supplier Employees and Supplier Executives regarding the processing, storage and transfer of your personal data within the framework of the Personal Data Protection Law No 6698 ("KVKK") and its activities arising from relevant legislation and legal regulations.

1) What Are the Personal Data Categories We Process and For What Purposes Do We Process Them?

Your personal information can be processed by Comita according to article 4.2 of KVKK in accordance with the principles of

- (i) Being in conformity with the law and good faith,
- (ii) Being accurate and when necessary, up to date,
- (iii) Being processed for specified, explicit, and legitimate purposes,
- (iv) Being relevant, limited and proportionate to the purposes for which data are processed,
- (v) Being stored only for the time designated by relevant legislation or necessitated by the purpose for which data are collected

within the scope of our ongoing business relations with our business partners, it can be processed for the following purposes (it is possible for one person to fall into multiple categories).

A. Our Online Visitors

Transaction security information (e.g. your IP address information) of our online visitors using our website will be processed for the following purposes;

- a) conducting activities in accordance with the legislation,
- b) execution of information security processes,
- c) providing information to authorized persons, institutions and organizations,
- d) access to our website via the Internet.

B. Our Customers

Identity information, contact information, customer transaction information (e.g. order information), legal transaction information of the executives and/or employees of our legal person customers and/or natural person customers will be processed for the following purposes.

- a) conducting activities in accordance with the legislation,
- b) conducting financial and accounting operations,
- c) execution / audit of business activities,
- d) execution of after-sales support services for goods/services,
- e) carrying out sales processes of goods/services,
- f) execution of contract processes,
- g) giving necessary information to authorized persons, institutions, and organizations,
- h) follow-up and conducting of legal affairs,
- i) carrying out storage and archiving operations,
- j) conducting risk management operations,

1 / 3

- k) carrying out loyalty management programmes for company/products/services
- l) conducting communication activities.

C. Our Supplier Employee

Identification information, contact information of our supplier employees will be processed for the following purposes;

- a) conducting communication activities,
- b) execution / audit of business activities,
- c) ensuring physical security,
- d) conducting supply chain management processes,
- e) conducting activities in accordance with the legislation.

D. Our Supplier Executive

Identity information, contact information, customer transaction information, legal transaction information of our natural person suppliers or legal person supplier executives will be processed for the following purposes;

- a) execution / audit of business activities,
- b) execution of goods / service procurement processes,
- c) conducting financial and accounting affairs,
- d) execution of contract processes,
- e) execution of investment processes,
- f) follow-up and conducting of legal affairs.

2) What Are the Collection Methods of Your Personal Data?

Your personal data specified in categories above are gathered in automated or non-automated ways through physical means such as order forms, contracts, visitor forms, or information systems and electronic devices (e.g. telecommunications infrastructure, computers and phones), third parties (e.g. KKB and Findex), our website and other documents declared by the person concerned.

3) What Is the Legal Reason For Collecting Your Personal Data?

Your personal data is processed by Comita in order to achieve the objectives described above, on the basis of the following legal reasons as stated in Article 5 of KVKK;

- (i) Explicitly stipulated in laws,
- (ii) Provided that it is directly related to the establishment or execution of a contract, the processing of personal data of the contract parties is necessary,
- (iii) Data processing is mandatory for the data controller to fulfil their legal obligation,
- (iv) Data processing is mandatory for the establishment, use or protection of a right,
- (v) Data processing is mandatory for the legitimate interests of the data controller, provided it does not harm the fundamental rights and freedoms of the data subject.

4) Do We Transfer Your Personal Data to a Third Party?

- a. **Personal data of our online visitors** can be shared with judicial authorities and authorized public institutions and organizations for the purpose of resolving legal disputes and if required by the relevant legislation.

2 / 3

- b. **Personal data of our customers** is transferred to authorized public institutions and organizations for the purposes of conducting activities in accordance with the legislation, follow-up and execution of legal affairs, providing information to authorized persons, institutions and organizations, execution / audit of business activities within the scope of the legal regulations; to our group companies, information companies, suppliers, cargo companies, banks and our financial advisor to the extent necessary for the proper performance of the service. In addition, the personal data in question may be transferred to the law office and judicial authorities from which we receive service in order to be used as evidence in legal disputes that may arise in the future.
- c. **Personal data of our supplier employee** is transferred to authorized public institutions and organizations for the purposes of conducting activities in accordance with the legislation, follow-up and execution of legal affairs, providing information to authorized persons, institutions and organizations, execution / audit of business activities within the scope of the legal regulations; to our group companies, information companies, suppliers, cargo companies, banks and our financial advisor to the extent necessary for the proper performance of the service. In addition, the personal data in question may be transferred to the law office and judicial authorities from which we receive service in order to be used as evidence in legal disputes that may arise in the future.
- d. **Personal data of our supplier executive** is transferred to authorized public institutions and organizations for the purposes of conducting activities in accordance with the legislation, follow-up and execution of legal affairs, providing information to authorized persons, institutions and organizations, execution / audit of business activities within the scope of the legal regulations; to our group companies, information companies, suppliers, cargo companies, banks and our financial advisor to the extent necessary for the proper performance of the service. In addition, the personal data in question may be transferred to the law office and judicial authorities from which we receive service in order to be used as evidence in legal disputes that may arise in the future.

5) Do We Transfer Your Personal Data Abroad?

As Comita, your personal data may be transferred abroad based on your explicit consent, in order to enable us to work in integration with our headquarters located abroad and to ensure the continuity of our business processes, in line with their demands. Clarification and express consent regarding this will be informed only to the data subjects, separately.

6) How Can You Exercise Your Rights Regarding Your Personal Data?

You can submit your requests to Comita within the scope of Article 11 of KVKK, which regulates the rights of the data subject, via the "Application Form to Data Controller" prepared for your convenience in accordance with the Communiqué on Application Procedures and Principles to Data Controller in writing to Gürsel Mahallesi İmrahor Cadde No: 29A/51 Kağıthane İstanbul or submit to the e-mail address istanbul.office@comitagroup.com

Data Controller: Comita Razvoj Projektiranje Proizvodnja In Inzeniring D.O.O. Merkezi Slovenya İstanbul Merkez Şubesi

Address: Gürsel Mahallesi İmrahor Cadde No: 29A/51 Kağıthane İstanbul

Mail: istanbul.office@comitagroup.com