

PROMETEON TURKEY ENDÜSTRİYEL VE TİCARİ LASTİKLER A.Ş.
POLICY ON PROTECTION OF PERSONAL DATA AND PRIVACY

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A. SCOPE

This policy named as Protection of Personal Data and Privacy Policy is designed to provide the necessary information for all of the rules for the processing of personal data according to the Protection of Personal Data Act No. 6698 dated March 24, 2016 and published in the Official Newspaper No. 29677 of 7 April 2016 and is approved by the Prometeon Turkey Endüstriyel ve Ticari Lastikler A.Ş.'s ("Prometeon") Board of Directors on the date of 27.12.2017.

B. DEFINITIONS

Personal data:	Identity is any kind of information that is specific or identifiable and a concrete content or identity that expresses the physical, economic, cultural, social or psychological identity of the person, including all cases where the person is identified as the result of being associated with a record such as a tax number.
Personal data of special nature:	The data with respect to race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, associations foundation or trade union membership, health, sexual life, criminal conviction and security measures as well as biometric and genetic data.
Explicit consent:	Explicit consent on a specific topic, based on information and free will.
Anonymization:	Making personal data unlikely to be associated with any specific or identifiable real person in any way, even when paired with other data.
Personal data processing:	Recording, storing, maintaining, altering, rearranging, disclosing, transferring, taking over, acquiring, classifying or using personal data in a non-automatic manner, provided that the personal data is completely or partially automatic or is part of any data recording system. This includes all transaction types performed on the data, starting from the first time the data is obtained.
Data subject:	The natural person whose personal data is processed
Data registry system:	Registry system in which personal data is structured according to certain criteria.
Data controller:	A real or legal person who is responsible for the establishment and management of the data registry system which determines the processing purposes and means of personal data.
Data processor:	A real or legal person who processes personal data based on the authority given by the data controller on his/her behalf
KVKK:	Law No. 6698 on Personal Data Protection, dated March 24, 2016 and published in the Official Newspaper No. 29677 of 7 April 2016
Board:	Personal Data Protection Board
Institution:	Personal Data Protection Institution
Policy:	Prometeon Personal Data Protection and Privacy Policy

C. REFERENCES

Protection of Personal Data Act ('KVKK'):	This policy is based on Law No. 6698 on Personal Data Protection, dated March 24, 2016 and published in the Official Newspaper No. 29677 of 7 April 2016
Management Policy for Requests from Data subjects:	This is the detailed Policy prepared in Prometeon within the scope of KVKK which will be used to meet the requests of the data subjects.

D. MODIFICATIONS

Amendments to the present Policy, together with the enactment of additional legislation within the law at various times, can be followed from Prometeon internet site and Prometeon intranet site, as well as the current version of this policy is also accessible from this institutional sites.

1 PURPOSE

Prometeon operates, as the data controller, in accordance with the law by mainly offering various products in tire production areas; light commercial vehicles, trucks and keeping the safety of the personal data of the authorized dealers, suppliers, customers, employees, employees of the Group and their employees and other real persons establishing a relationship with the company or any other purpose or channel, in order to be able to carry out their activities on behalf of itself or on behalf of the representatives.

The aim of this Policy is to inform the relevant persons by explaining about these processing activities and personal data systems that Prometeon carries out and thus to give transparency to personal data.

In this context, Prometeon has explained, within the scope of KVKK, the processing of personal data, detailing the Data Subjects involved in this process about their rights, together with the use of cookies and similar technologies, in this Policy.

2 PERSONAL DATA

2.1 General Principles on Personal Data Processing

Prometeon processes personal data by the mean of this policy in accordance with the provisions of Article 4 sentence 2 of the KVKK and in accordance with the following principles for the purposes exemplified in the "Purposes of Processing of Personal Data":

- To comply with the rules of law and honesty
- Accurate and up-to-date
- Processing for specific, clear and legitimate purposes
- Connected, limited and measured
- In accordance with the legislation and the storage for the purpose of processing as long as it required.

2.2. Data Processed by Prometeon

Personal data are processed on the basis of explicit consent obtained from the Data Subjects in Prometeon or on behalf of activities that can be carried out without explicit consent under Articles 5 and 6 of the KVKK and are only available for the purposes exemplified in this Policy of the Processing of Personal Data. These personal data types, which are diversified and differentiated according to the nature and the nature of the relationship between Prometeon and the data proprietor, the communication channels used and the purpose of the betting, and which are processed in accordance with the principles of the present Policy, are as follows:

- **Identity information;** Name, surname, profession, title, employment information, educational status, gender, marital status, spouse / child information, citizenship status, identity card copy, copy of the population copy, date of birth, place of birth mentioned on the identification documents such as passport and driver's license, identity number, blood group, religion and photograph.
- **Contact information;** In addition to contact information such as address, e-mail, telephone and fax numbers, contact records in the form of telephone calls and e-mail correspondence,
- **Real Personal Information;** Real person information in documents intended for legal entities such as tax labels, trade newspapers, authorization certificates, qualification documents, signature circulars and activity documents,
- **Financial Information;** Detailed financial data on pricing, reconciliation, collection and payment activities.

2.3. Purposes of Processing of Personal Data

Personal data may be processed by Prometeon for the following purposes and may be retained for as long as these purposes and related legal periods are required.

- Realization of the activities for which Prometeon is responsible for execution within the scope of legal and administrative obligations,
- Clarification of changes in the rules and policies adopted by the data holder in the legislative or Prometeon's context,
- The management and execution of the activities subject to the legal process, together with the inquiry, determination, notification and prevention of unlawful acts,
- Protection of legitimate interests,
- Negotiations of contracts, creation and performance
- Identification of the situation within the scope of the request and the questions and providing the return answer to the related person,
- Conducting publicity and marketing activities and taking the view of Data Subjects together with questionnaires and votes
- Increasing productivity by ensuring workflow and coordination between the units,
- Examination of candidates' compliance with the relevant positions in the job application, candidate evaluation and recruitment processes, and communication with those candidates who seems feasible for the job and those who applied.
- Keeping visit records and cargo tracking,
- Taking the necessary precautions by ensuring the safety of the electronic systems and physical environments owned by Prometeon or used by Prometeon and making the relevant evaluations.

2.4. Transfer of Personal Data

Prometeon can carry out domestic and international data transfer within the framework of the objectives exemplified in the "Policies for the Processing of Personal Data" section of this Political Code and in accordance with Articles 8 and 9 of the KVKK and personal data can be stored and processed in the server and electronic mediums used in this context. The Personal Data Inventory prepared by Prometeon provides detailed information on the parties involved in the data transfer and the data transfer purposes. The nature of these transfers and the parties involved, the relationship between the data bearer and the Prometeon, vary depending on the nature and purpose of the transfer, and on the relevant legal basis, which are generally as follows:

- Legal institutions such as law firms and institutions that receive support for legal purposes,
- Government-affiliated institutions and organizations,
- Prometeon Group companies,
- Prometeon business units in order to provide coordination, cooperation and productivity,
- Authorized dealers who provide Prometeon services,
- Experts, authorized dealers, etc. service companies and suppliers,
- Banks that will enable financial transactions to be realized,

2.5. Collection of Personal Data

In order to meet the objectives exemplified in the "Policies of the Personal Data" section of this Political Policy by Prometeon, according to the in the 5th and 6th articles of KVKK, Prometeon can be able to collect personal data from the employees and customers, agencies, suppliers, business partners, group companies, call centers, experts, and other physical media, as well as through internet sites, mobile applications, social media and other public open media or organized events, trainings, organizations and similar events.

2.6. Personal Data Retention Time

Personal data is kept in Prometeon within the relevant statutory retention periods and are retained for the duration of the related activities and the purposes set out in the Policy. Personal data that ends its intended use and ends the legal retention period is deleted, destroyed or anonymized by Prometeon in accordance with Article 7 of the KVKK.

2.7. Data Subject Rights under KVKK Framework

Under Article 11 of the KVKK, the rights of the actual persons whose personal data are processed are regulated and according to this article the data holders have the following rights on Prometeon:

- To learn whether personal data is processed,
- To request information about personal data if it has been processed,
- To learn the purpose of processing personal data and whether they are used appropriately for their purpose,
- To Know the third parties to which personal data are transferred in Turkey or abroad,
- To request the correction of personal data if it is incomplete or incorrectly processed,
- To request the deletion or destruction of personal data if the reason for the processing of the data is inadequate,
- To request that correction and deletion be reported to a third party to whom personal data is transmitted,
- To do objection to the appearance of a result against the person himself by analyzing the processed data exclusively through automated systems,
- To do claim that the damage should be eliminated in case of any damage due to the processing of personal data

Requests from Data Subjects for the use of one of the above rights will be met by Prometeon within 30 days at the latest. These requests can be forwarded in person to Prometeon 'Esentepe Mah. Buyukdere Cad. Bahar Sok. River Plaza No: 13 Kat: 13, Esentepe, Şişli, İstanbul ', or by sending a notarized document or sending it to prometeon.kvkk@hs01.kep.tr with secure electronic signature. If the claims also require a cost, Prometeon will be able to charge fees in the amount determined by the relevant legislation.

2.8. Transferring data abroad

In order to meet the purposes exemplified in the "Processing of Personal Data" section of this Political Code for the purpose of further processing as specified in the Processing, Storage, Administration or Administrative Policy, the personal data may be exported in accordance with applicable legislation. In these transmissions, necessary precautions are taken to protect personal data as required.

2.9. Security of Personal Data

Prometeon is committed to protect the privacy and security of personal data. In this respect, technical and administrative security measures are taken to protect personal data against unauthorized access, damage, loss or disclosure. In this direction, necessary system access controls, data access controls, secure transfer controls, business continuity controls and other necessary corporate controls are applied. There are camera and monitoring activities in the building within the scope of the privacy and security of personal data and these activities are carried out by Prometeon carefully.

Prometeon carries out the necessary channels, internal operations, administrative and technical regulations, taking into account the Personal Data Protection Act for the purposes of assessing the rights of personal Data Subjects and providing the necessary information to the personal Data Subjects. In the event that personal data holders transmit their requests to Prometeon in writing in the scope of KVKK law then according to the nature of request Prometeon can process the request free of charge within thirty days at the latest. However, if a fee is foreseen for the Protection of Personal Data then Prometeon can charge that fee at the time specified in the Protection of Personal Data Board.

3 COOKIES AND SIMILAR TECHNOLOGIES

3.1. General

The small data files sent by the internet network server to the users' devices via the internet browser being used are referred to as cookies, and the internet sites recognize the users with these cookies and the life of the cookies is different depending on the browser settings.

These cookies are created through Prometeon-managed systems, while at the same time some service providers authorized by Prometeon can provide IP address, unique identifier and device identifier information by placing similar technologies in the devices of the users. In addition, third party links in Prometeon systems are subject to the privacy policies of these third parties, while the responsibility for privacy practices does not belong to Prometeon, and it is recommended to read the privacy policy of the site when visiting the site in question.

3.2. Cookie Types

Cookies, which provide convenience for mainstream users, are basically grouped into 4 main groups:

- i. **Session Cookies:** It is a cookie that allows you to take advantage of various features such as the transfer of information between web pages and the systematic recall of user-entered information, and it is necessary for the functions of the Prometeon website to function properly.
- ii. **Performance Cookies:** These are the cookies that collect the information related to the frequency of visits to the pages, possible error messages, site usage patterns with the total time users spend on the relevant page and are used to improve the performance of the Prometeon internet site.
- iii. **Functional Cookies:** These are cookies that remind users of previously selected options for convenience and within the scope of Prometeon website aims to provide users with advanced internet features.
- iv. **Advertisement and Third-Party Cookies:** These are cookies from third-party suppliers and allow the use of certain functions and advertising on the Prometeon website.

3.3. Purposes of the use of Cookies

The purposes related to the use of cookies used by Prometeon are as follows:

- i. **Operational uses:** Prometeon can use cookies that provide access to functions on this site or that detect irregular behavior in order to ensure the administration and security of their systems.
- ii. **Uses for functionality:** Prometeon can use cookies to remind users of their information and past selections to make their systems easier to use and provide user-specific features.
- iii. **Performance-oriented uses:** Prometeon can use cookies to evaluate and analyze user interaction and interaction with submitted messages to improve and measure their performance.
- iv. **Advertising uses:** Prometeon can use cookies that measure the effectiveness of these ads or analyze their click throughs in order to convey advertisements and similar content within their interests over their own or third-party systems.

3.4. Disabling Cookies

The use of cookies is pre-defined in many browsers, and users can change this preference from browser settings, thus deleting existing cookies and refusing future cookie usage; if the use of cookies is canceled, it is possible that some features of the Prometeon system cannot be used.

The method for changing the selection of cookie usage varies depending on the type of browser and can be learned when requested by the respective service provider.

4 IMPLEMENTATION AND UPDATES

This Policy will enter into force on the date approved by the Company's Board of Directors. The amendments to be made in the Policy and the necessary work to put these changes into effect shall be made by the Legal Adviser and KVKK Working Group and the amendments will take effect after the approval of the Company General Manager. The Policy is updated regularly, once a year. However, the Company reserves the right to inspect this Policy and, when necessary, to update, amend or remove the Policy and form a new Policy in accordance with the legislative amendments, a change in the cited

technical standard, the actions of the Personal Data Protection Board and / amount. The decision to abolish the Policy is held by the Company's Board of Directors.