

# Processing of Personal Data Information Notice

## 1. Processing of Personal Data

This information notice has been prepared by **IMCA ELEKTRONİK VE BİLİŞİM SAN. VE TİC. A.Ş.**, in its capacity as Data Controller, pursuant to Article 10 of the Law on the Protection of Personal Data No. 6698 ("KVKK") and the Communiqué on the Procedures and Principles to be Followed in the Fulfillment of the Obligation to Inform.

Our aim is to inform you in the most transparent and comprehensive way, in accordance with Article 10 of the Law, regarding the identity of the Data Controller, the purposes for which personal data will be processed, to whom and for what purposes the processed personal data may be transferred, the method and legal reason for collecting personal data, and the other rights you have under Article 11 of the Law, which are detailed below in Article 7.

## 2. Purposes of Processing Personal Data

Your personal data will be processed in accordance with the fundamental principles set forth by the KVKK and within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the KVKK, for the purposes listed below:

- Carrying out the commercial activities of **IMCA ELEKTRONİK VE BİLİŞİM SAN. VE TİC. A.Ş.** in compliance with contracts, legislation, and company policies
- Foreign personnel work and residence permit procedures
- Conducting management activities
- Providing information to authorized persons, institutions, and organizations
- Carrying out talent/career development activities
- Carrying out product/service marketing processes
- Executing wage policy
- Managing supply chain processes



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- Ensuring the security of movable property and resources
- Tracking requests/complaints
- Conducting strategic planning activities
- Executing contract processes
- Carrying out social responsibility and non-governmental organization activities
- Conducting storage and archiving activities
- Managing risk processes
- Carrying out advertising/campaign/promotion processes
- Conducting performance evaluation processes
- Carrying out marketing analysis studies
- Organizing and managing events
- Carrying out activities aimed at customer satisfaction
- Managing customer relationship processes
- Executing goods/services sales processes
- Providing after-sales support services for goods/services
- Executing goods/service purchasing processes
- Carrying out logistics activities
- Conducting business continuity activities
- Receiving and evaluating suggestions for the improvement of business processes



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- Carrying out occupational health and safety activities
- Execution and supervision of business activities
- Planning human resources processes
- Carrying out communication activities
- Monitoring and conducting legal affairs
- Executing assignment processes
- Carrying out finance and accounting operations
- Conducting activities in compliance with legislation
- Managing access authorizations
- Conducting training activities
- Executing processes related to employee benefits and entitlements
- Fulfilling obligations arising from employment contracts and legislation for employees
- Conducting employee satisfaction and engagement processes
- Managing job application processes of employee candidates
- Executing recruitment and placement processes for candidates/interns/students
- Ensuring the commercial and legal security of natural persons who are in a business relationship with **IMCA ELEKTRONİK VE BİLİŞİM SAN. VE TİC. A.Ş.**, and following up legal proceedings
- Evaluating and tracking requests and complaints
- Ensuring the security of physical premises
- Maintaining information security activities and fulfilling the requirements of Law No. 5651



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- Providing information to authorized persons, institutions, and organizations
- Conducting occupational health and safety activities
- Carrying out administrative, financial, legal, and other activities
- Fulfilling obligations towards our customers within the scope of contract execution
- Meeting information technology requirements, system structure, and the necessity of IT support services received
- Carrying out lawsuits, enforcement proceedings, and other legal transactions
- Reviewing, evaluating, and responding to requests received from official authorities

Based on the legal grounds that it is expressly stipulated by law for its purposes, that it is directly related to the establishment or performance of a contract, that it is mandatory in order for our company to fulfill its legal obligations, that it has been made public by the data subject, that data processing is necessary for the establishment, exercise, or protection of a right, and that it is mandatory for the legitimate interests of the data controller provided that it does not harm the fundamental rights and freedoms of the data subject, personal data are processed within the framework of the principles set forth in Articles 5 and 6 of the Law.

### **3. To Whom and For What Purposes Your Personal Data May Be Transferred**

Your personal data;

In order for our company to fulfill its legal obligations arising from laws and regulations:

- Your identity, contact, and financial data, primarily the information requested by authorized institutions and organizations, may be transferred to such authorized institutions or organizations within the framework of applicable legislation,
- Your financial data may be transferred to banks for the purpose of carrying out our financial activities,
- Your legal data may be transferred to law firms for the purpose of conducting legal proceedings,



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- Your identity, contact, and financial data may be transferred to the managers, company officers, shareholders, employees, business partners, persons or third parties from whom services are obtained, consultants, auditors, private law or public legal entities of **IMCA ELEKTRONİK VE BİLİŞİM SAN. VE TİC. A.Ş.**, for the purposes of conducting our commercial activities, determining strategies, and carrying out human resources, financial, and administrative activities, within the scope of the personal data processing conditions and purposes specified in Articles 8 and 9 of the KVKK,
- For the purpose of conducting our commercial activities, your identity (name-surname) and contact (e-mail, phone number) information may be transferred to foreign supplier and manufacturer companies.

#### 4. Method and Legal Basis for Collecting Personal Data

Your personal data are collected through any information and documents you provide to the Data Controller personally, by hand, via the website, e-mail, courier, reference, and similar methods:

- Through phone, e-mail, fax, corporate correspondence, and reporting activities,
- Through legal documents and notifications delivered to us in order to fulfill our legal obligations,
- Through commercial processes carried out to enable the Data Controller to continue its business activities,
- During the execution, continuation, development, and supervision of our activities as required by applicable legislation,
- Through promotional and similar processes related to our activities,
- During interviews conducted with job candidates,
- Through submission of written or electronic CVs/application forms via e-mail, courier, and similar methods,
- Through the continuation of individuals' legal and commercial security, as well as through determination and implementation of financial, administrative affairs, and business strategies,

and are collected in line with the conditions set out in Articles 5 and 6 of the Law.



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The personal data collected through these methods and for these purposes are processed for the execution of our commercial activities, the fulfillment of our legal obligations, the establishment or performance of a contract, the protection of our legitimate interests, the execution of human resources, finance/accounting, and information security policies, ensuring physical security and supervision, compliance with national legislation, and fulfilling information transfer and reporting obligations requested by public authorities or other institutions.

## 5. Rights of the Personal Data Subject

As the personal data subject, you may exercise your rights set forth in Article 11 of Law No. 6698, which are listed below:

- To learn whether personal data are being processed,
- To request information if personal data have been processed,
- To learn the purpose of processing personal data and whether they are being used in accordance with that purpose,
- To know the third parties to whom personal data are transferred, whether domestically or abroad,
- To request the correction of personal data if they are incomplete or inaccurate, and to request that the transaction carried out within this scope be notified to third parties to whom personal data have been transferred,
- To request the deletion or destruction of personal data in the event that the reasons requiring their processing cease to exist, even though they have been processed in accordance with Law No. 6698 and other relevant laws, and to request that the transaction carried out within this scope be notified to third parties to whom personal data have been transferred,
- To object to the emergence of a result against the person themselves by means of analyzing processed data exclusively through automated systems,
- To demand compensation in case of damage due to unlawful processing of personal data.



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## 6. Application Method Regarding the Rights of the Personal Data Subject

To exercise your rights mentioned above, you may submit your request in accordance with Article 13, paragraph 1 of Law No. 6698 and the Communiqué on the Principles and Procedures of Application to the Data Controller published in the Official Gazette No. 30356 dated 10.03.2018, by filling out the Data Subject Application Form available on the website [www.imca.com.tr](http://www.imca.com.tr), and delivering it in writing and signed either to the company address or to the e-mail address [veriguvenligi@imca.com.tr](mailto:veriguvenligi@imca.com.tr).

The Company reserves the right to verify your identity before responding. Depending on the nature of the request, the Company will finalize the request as soon as possible and at the latest within thirty days. In this regard, personal data subjects are required to provide complete and accurate information and documents to us according to the nature of the request.

The Data Controller reserves the right to verify your identity before responding to your request. The Data Controller will finalize your request as soon as possible and at the latest within thirty days, depending on the nature of the request.

Therefore, the accuracy of the information you share with the Data Controller is necessary for you to exercise your rights, and responsibility for any errors resulting from incorrect information shall not belong to the Data Controller. However, if the transaction requires an additional cost, the Company reserves the right to charge you the fee set forth in the tariff determined by the Board.



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