	<b>POLICY FOR THE PROTECTION OF SPECIAL CATEGORIES OF PERSONAL DATA UNDER KVKK</b>	Dok. No	K.0000.IN.H.0024
		Publication Date	25.11.2020
		Revision No	0
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## KUZUFLEX METAL SANAYİ TİCARET ANONİM ŞİRKETİ("KUZUFLEX") SPECIAL PERSONAL DATA PROTECTION POLICY

### 1. INTRODUCTION

#### 1.1. Purpose

The Special Qualified Personal Data Protection Policy ("Policy") has been prepared by KUZUFLEX METAL SANAYİ TİCARET ANONİM ŞİRKETİ ("KUZUFLEX") to establish the procedures and principles regarding the use and protection of special qualified personal data in the record environments. KUZUFLEX has prioritized the processing of personal sensitive data of its employees and job candidates in compliance with the Turkish Constitution, international agreements, Law No. 6698 on the Protection of Personal Data ("Law"), and other relevant legislation, ensuring that the rights of the relevant individuals are effectively exercised. In accordance with the Decision No. 2018/10 dated 31/01/2018 of the Personal Data Protection Board regarding "Measures to be Taken by Data Controllers in the Processing of Special Qualified Personal Data," the use and protection of special qualified personal data is carried out by KUZUFLEX in accordance with this Policy prepared in this direction.

#### 1.2. Scope

KUZUFLEX processes special qualified personal data of employees and job candidates only in cases explicitly envisaged in the laws and imposing legal obligations, by fulfilling the obligation of informing and obtaining explicit consent. This Policy applies to all record environments where special qualified personal data managed by KUZUFLEX is processed and activities related to the processing of special qualified personal data.

#### 1.3. Definitions


<b>Criminal Convictions and Security Measures</b>	Information regarding judicial fines, imprisonment sentences, deferred sentences, and security measure decisions issued by domestic and foreign judicial authorities concerning individuals.
<b>Health Information</b>	Any information indicating the health and disability status of individuals.
<b>Biometric Data</b>	Information related to individuals' fingerprint and facial recognition data.

### 2. RESPONSIBILITY, RECORD ENVIRONMENT, AND USAGE RULES

Special category personal data security is ensured by the responsible unit or data processor.

Data Category	Related Individual	Responsible Unit	Record Environment	Process and Description
Criminal Convictions and Security Measures	Employee	Human Resources Unit	Printed: Physical documents within the Personnel File	During the process, criminal record data regarding the employee's convictions and security measures are processed by the Human Resources Unit.

				<p>* Criminal records in line with the Free Zone request are shared with the Free Zone.</p> <p>Decisions regarding criminal convictions and security measures about the employee are only viewed by the Human Resources Unit during the hiring process to confirm that the employee is not actively sought for a current offense. This is done by reviewing the criminal record / certificate of good conduct, which is then handed over to the employee concerned.</p>
Health Information	Employee	Human Resources Unit * Dietitian * Occupational Physician	<p>Printed: Relevant health documents. (Entry and Periodic Examination Forms, Disability Certificate, etc.) - Kept in the Health File Folder.</p> <p>Occupational Physician is included in the program used.</p> <p>Dietitian stores them on their computer and in printed format.</p>	<p>Occupational health examination is conducted by the Occupational Physician during recruitment.</p> <p>* Health reports required at the time of employment.</p> <p>* Periodic examinations are conducted by the Occupational Physician.</p> <p>* Occupational accident notifications are prepared.</p> <p>* Temporary Disability Reports are issued.</p> <p>* In the processes of the Dietitian, health data of the employees are processed for various purposes within the framework of relevant laws and legal basis of explicit consent.</p>
Biometric Data	Employee	Human Resources Department	Program: Perkotek Program	<p>Monitoring of employee entry and exit activities.</p> <p>* Performance evaluations.</p> <p>* Execution of attendance processes.</p>

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### **3. Data Protection and Transfer Rules**

Measures related to data security are determined by this Policy and by the Human Resources Department. Access to sensitive personal data by third parties, including the KUZUFLEX management, is prohibited, except for responsible units. In special cases, a general statement such as "suitable/not suitable" for access to sensitive personal data may be made by the responsible unit to the requester. The environments where sensitive personal data is stored may be inspected under the supervision of the responsible unit in special cases, but duplicating the documents and records containing this data, or using the sensitive personal data obtained during these inspections in other record environments, is strictly prohibited.

Except for transfers to Official Institutions in cases of legal obligation, sensitive personal data cannot be transferred to third parties/institutions directly without the request or consent of the relevant person. Personal data transfers:

1. Through the Official Institution's electronic system,
2. Preferably via the sFTP method in electronic environments, or alternatively through the corporate email address to another corporate email address with the document encrypted in the email attachment without sensitive personal data in the email content,
3. In paper-based transfers, before being placed in the mail/courier envelope, the relevant document will be sent by registered mail with a separate paper envelope with the inscription "confidential".

### **4. POLICY STORAGE**

The Policy is prepared in two different formats: wet-signed (printed paper) and electronic. The electronically prepared Policy is notified to the managers of KUZUFLEX units. A printed paper copy is kept by the Human Resources Department.

### **5. POLICY UPDATE PERIOD**

The Policy is reviewed as needed, and the necessary sections are updated.

### **6. EFFECTIVENESS AND ABOLITION OF THE POLICY**

The Policy is considered effective as of the date of signature. In the event of a decision to abolish it, the wet-signed old copies of the Policy are canceled (by stamping or writing "canceled") and signed by the Human Resources Department, then kept by the Human Resources Department for at least 5 years.