




**MAKİNE VE KİMYA ENDÜSTRİSİ A.Ş.**

**PERSONAL DATA PROCESSING AND  
PROTECTION INSTRUCTION**

<b>Document No.</b>	<b>KSY-TLM-006</b>
<b>Revision No.</b>	<b>00</b>
<b>Revision Date</b>	<b>-</b>
<b>First Issue Date</b>	<b>17.11.2025</b>

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## 1. PURPOSE

The Personal Data Processing and Protection Instruction ("Instruction") has been prepared to determine the procedures and principles regarding the business and transactions concerning the processing and protection of data within the scope of the Personal Data Protection Law No. 6698, of Makine ve Kimya Endüstrisi Anonim Şirketi (hereinafter referred to as "MKE A.Ş." or "Data Controller")


## 2. SCOPE

It covers natural persons whose personal data are processed in the units of MKE A.Ş., as well as natural and legal persons who process personal data wholly or partially by automated means or non-automated means provided that it forms part of any data filing system.

## 3. DEFINITIONS and ABBREVIATIONS

### 3.1. Definitions

Explicit consent	Freely given, specific and informed consent
Law No. 6698	Personal Data Protection Law
Personal data	Any information relating to an identified or identifiable natural person
Processing of personal data	Any operation which is performed on personal data, wholly or partially by automated means or non-automated means which provided that form part of a data filing system, such as collection, recording, storage, protection, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization, preventing the use thereof
User	Everyone using MKE A.Ş.'s information resources
Company	Makine ve Kimya Endüstrisi Anonim Şirketi
Mobile Devices	Portable computers, mobile phones, smartphones, tablets, etc.
Database	A collection of data organized in a way that can be easily accessed, managed, and updated. A database keeps records of all information belonging to software (product information, user information, sales and purchase information, accounting, and document information, etc.).
Data Filing System	The filing system where personal data are processed by being structured according to specific criteria

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Recording Medium	Any type of environment that keeps the personal data processed wholly or partially by automated means or non-automated means which provided that form part of a data filing system
Data Processor	The natural or legal person who processes personal data on behalf of the data controller upon its authorization
Data Controller's Registry Information System (VERBIS)	Information system that is accessible through the Internet, established and managed by the Presidency, that data controllers will use for the registration with the Registry and the other operations related to the Data Controllers' Registry kept by the Presidency of Personal Data Protection Authority of Türkiye
Data Controller	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 filing system

### 3.2. Abbreviations

EBYS	Electronic Document Management Systems
Authority	Personal Data Protection Authority

## 4. RESPONSIBILITIES


- 1) The Legal Directorate is responsible for the preparation and revision of this instruction.
- 2) The Quality Directorate (Quality Systems Management) is responsible for the publication of this instruction in the MKE A.Ş. Quality Management System (QMS) software.
- 3) The Legal Directorate is responsible for its implementation.

## 5. REFERENCED AND CITED DOCUMENTS AND FORMS

### 5.1. Referenced Documens:

- (1) Personal Data Protection Law No. 6698
- (2) TS ISO/IEC 27001:2013 Information Technology – Security Techniques – Information Security Management Systems – Requirements
- (3) Law on Regulation of Publications on the Internet and Combating Crimes Committed Through These Publications No. 5651
- (4) By-Law on Erasure, Destruction or Anonymization of Personal Data published in the Official Gazette dated 28.10.2017 and numbered 30224



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(5) By-Law on the Procedures and Principles for the Transfer of Personal Data Abroad published in the Official Gazette dated 10.07.2024 and numbered 32598

(6) By-Law on Data Controllers Registry published in the Official Gazette dated 30.12.2017 and numbered 30286

(7) By-Law on State Archival Services published in the Official Gazette dated 18.10.2019 and numbered 30922

(8) By-Law on Procedures and Principles to be Applied in Official Correspondence published in the Official Gazette dated 10.06.2020 and numbered 31151

## 5.2. Cited Documents:

(1) MKE A.Ş. Personal Data Storage and Disposal Instruction (KSY-TLM-005)

(2) MKE A.Ş. Data Subject Application Form (KSY-FRM-026)

(3) MKE A.Ş. Personal Data Processing Inventory Management Procedure (KSY-KSP-018)<sup>1</sup>

(4) MKE A.Ş. Standard File Plan

## 6. IMPLEMENTATION

The "Protection of Personal Data Law" No. 6698, dated 24/03/2016, aims to protect the fundamental rights and freedoms of individuals, especially the privacy of private life, in the processing of personal data, and to regulate the obligations and rules to be complied with by natural and legal persons who process personal data. If personal data must be processed as per legislation, they are processed in accordance with the rules. Decisions of the Personal Data Protection Authority Board and changes in the law are considered in doing so.


All employees of MKE A.Ş. are obliged to support the persons responsible for taking all administrative and technical measures required to fulfill the Data Controller's obligations regarding the security of personal data and for carrying out the processes included in this Instruction, and for carrying out the necessary work.

The senior manager of each unit is responsible for taking all kinds of measures and carrying out the necessary work required to fulfill the obligations regarding the storage and disposal of personal data in compliance with the relevant legislation by ensuring personal data security.

This Instruction regulates the principles of personal data processing, the conditions for processing, the purposes of processing, which personal data is processed and for how long, the conditions for transfer abroad, and data security. It covers the employees, former employees, interns, consultants, auxiliary

<sup>1</sup> This document is only available in Turkish.



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employees, service recipients, service providers, and all private/legal persons whose personal data MKE A.Ş. process.

### 6.1. Principles of Processing Personal Data

Personal data is processed within the framework of the following principles:

#### a. Lawfulness and Fairness

Actions are taken in compliance with the principles introduced by legal regulations and the general rule of trust and honesty when processing personal data.

#### b. Ensuring Personal Data is Accurate and Kept up to Date Where Necessary

Periodic checks and updates are made to ensure that the processed data is accurate and up-to-date, taking legitimate interests into account, and necessary measures are taken in this direction. Methods for controlling the accuracy of personal data and making necessary corrections are established within MKE A.Ş.

#### c. Processing for Specific, Explicit, and Legitimate Purposes

Personal data is processed based on explicit, specific, and legitimate data processing purposes.

#### d. Being Connected to, Limited by, and Proportional to the Purpose for Which They Are Processed

Processing of personal data that is not proportional to the foreseen purposes, irrelevant to the purpose, limited in scope, or unnecessary for the realization of the purpose is avoided.


#### e. Storage for the Period Laid Down by Relevant Legislation or the Period Required for the Purpose for Which the Personal Data Are Processed

Personal data is stored only for the period stipulated in the relevant legislation or necessary for the purpose for which they are processed. If a storage period is stipulated in the relevant legislation, that period is followed; if not, the data is stored for the period necessary for the processing purpose. If the period ends or the reasons requiring processing cease to exist, and there is no legal reason allowing longer processing, personal data is erased, destroyed, or anonymized according to the "Personal Data Storage and Disposal Instruction" (KSY-TLM-005).

### 6.2. Conditions for Processing Personal Data

The personal data processed by MKE A.Ş. are processed within the framework of the conditions below:

#### a. Explicitly Provided for in Laws

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Personal data may be processed in cases where the processing of personal data is explicitly foreseen by the legislation.

**b. Inability to Obtain Data Subject's Explicit Consent Due to Factual Impossibility**

Personal data may be processed if it is mandatory to protect the life or physical integrity of the person who is unable to disclose their consent due to actual impossibility or whose consent is not legally valid, or of another person.

**c. Directly Related to the Establishment or Performance of a Contract**

Personal data may be processed provided that it is directly related to the establishment or performance of a contract, and the processing of personal data belonging to the parties of the contract is necessary.

**d. Compliance with a Legal Obligation to Which the Data Controller Is Subject**

Personal data may be processed if it is mandatory to process the data to fulfill the Company's legal obligation.

**e. Personal Data Have Been Made Public by the Data Subject Himself/Herself**

Personal data may be processed if the person has made their personal data public.

**f. Data Processing Is Necessary for the Establishment, Exercise or Protection of Any Right**

Data may be processed without the explicit consent of the person if data processing is mandatory for the establishment, exercise, or protection of a right.

**g. Processing of Personal Data for the Legitimate Interests Pursued by the Data Controller**

Data may be processed without the explicit consent of the person if data processing is mandatory for the legitimate interests of MKE A.Ş., provided that it does not harm the fundamental rights and freedoms of the person.

**h. Processing Personal Data Based on Explicit Consent**


In cases where personal data cannot be processed based on any of the conditions specified in this Instruction, they may be processed based on the person's explicit consent.

**6.3. Conditions for Processing of Special Categories of Personal Data**

Some personal data is regulated separately as "special categories of personal data" and is subject to special protection.

**a. Processing Special Categories of Personal Data Based on Explicit Consent**



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Special categories of personal data may be processed with the explicit consent of the data subject, in accordance with the principles specified in this Instruction and by taking the necessary administrative/technical measures.

**b. Cases Where Special Categories of Personal Data May Be Processed Without Explicit Consent**

In situations where the explicit consent of the data subject is not present, special categories of personal data may be processed if explicitly provided for in the laws, or with the decision of the Authority and by taking adequate measures. Personal data concerning health may only be processed without the explicit consent of the data subject by persons under the obligation of secrecy or authorized institutions and organizations, for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning and management of health services and their financing and any other conditions as explicitly provided in Law No. 6698 article 6.

**6.4. Obligation to Inform Data Subjects**

The data subject is informed by MKE A.Ş. through the transmission/publication of the necessary clarification texts and this Instruction when their personal data is collected

**6.5. Categorization of Personal Data**

Within the scope of this Instruction, MKE A.Ş. may process personal data belonging to individuals in the categories specified below. When deemed necessary, changes may be made to the data subject and data category boxes in the table below.


Data Subject	Data Category		
Natural Person	Identity Communication Details Location Personnel Legal Action Customer Transaction Physical Security	Transaction Security Risk Management Finance Professional Experience Marketing Visual and Audio Records Union Membership	Health Information Criminal Conviction and Security Measures Biometric Data Other Information – Student Transactions, Employee Transactions Other Information – Vehicle Information

**6.6. Purposes of Processing Personal Data**

In accordance with the personal data processing conditions specified in Articles 5 and 6 of Law No. 6698, personal data of individuals may be processed by MKE A.Ş. for the following purposes:


• Execution of Emergency Management Processes	• Execution of Logistics Activities
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<ul style="list-style-type: none"> <li>• Execution of Information Security Processes</li> <li>• Execution of Employee Candidate / Intern / Student Selection and Placement Processes</li> <li>• Execution of Employee Candidate Application Processes</li> <li>• Execution of Employee Satisfaction and Loyalty Processes</li> <li>• Fulfillment of Obligations Arising from Employment Contracts and Legislation for Employees</li> <li>• Execution of Audit / Ethical Activities</li> <li>• Execution of Training Activities</li> <li>• Execution of Access Authorizations</li> <li>• Execution of Activities in Compliance with Legislation</li> <li>• Execution of Finance and Accounting Affairs</li> <li>• Ensuring Physical Security</li> <li>• Execution of Assignment Processes</li> <li>• Follow-up and Execution of Legal Affairs</li> <li>• Execution of Internal Audit / Investigation / Intelligence Activities</li> <li>• Execution of Communication Activities</li> <li>• Planning of Human Resources Processes</li> <li>• Execution / Supervision of Business Activities</li> <li>• Execution of Occupational Health / Safety Activities</li> <li>• Receiving and Evaluating Suggestions for the Improvement of Business Processes</li> <li>• Execution of Business Continuity Activities</li> </ul>	<ul style="list-style-type: none"> <li>• Execution of Goods / Service Procurement Processes</li> <li>• Execution of Goods / Service Sales Processes</li> <li>• Execution of Goods / Service Production and Operation Processes</li> <li>• Execution of Customer Relationship Management Processes</li> <li>• Execution of Customer Satisfaction Activities</li> <li>• Organization and Event Management</li> <li>• Execution of Marketing Analysis Studies</li> <li>• Execution of Performance Evaluation Processes</li> <li>• Execution of Risk Management Processes</li> <li>• Execution of Storage and Archiving Activities</li> <li>• Execution of Contract Processes</li> <li>• Follow-up of Requests / Complaints</li> <li>• Ensuring the Security of Movable Property and Resources</li> <li>• Execution of Supply Chain Management Processes</li> <li>• Execution of Wage Policy</li> <li>• Ensuring the Security of Data Controller Operations</li> <li>• Execution of Talent / Career Development Activities</li> <li>• Informing Authorized Persons, Institutions, and Organizations</li> <li>• Execution of Management Activities</li> <li>• Creation and Follow-up of Visitor Records</li> </ul>
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## 6.7. Transfer of Personal Data to Third Parties

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Personal data and special categories of personal data belonging to data subjects may be transferred to third parties (companies, authorized public authorities, natural persons) provided that necessary security measures are taken and the explicit consent of the persons is obtained, in line with the processing purposes.


**a. Transfer of Personal Data**

Personal data may be transferred to third parties in line with the data processing purposes and within the conditions specified in this Instruction.

**b. Third Parties to Whom Personal Data is Transferred and Purposes of Transfer**

Recipient Groups	Description	Data Transfer Purpose
Other – Subcontractors, Banks	Third parties who establish a contractual relationship to perform MKE A.Ş.'s activities, provide specific services on behalf of the company (e.g., subcontractors, cargo companies, IT service providers), and banks for financial transactions	Subcontractor: Performance of services and operational processes on behalf of MKE A.Ş. Bank: Carrying out financial transactions, salary payments, collection, and payment processes.
Natural or Legal Persons of Private Law	Natural persons with whom MKE A.Ş. is in a business relationship and who are legally permitted to share personal data (e.g., freelancers), or private law legal entities (e.g., consulting firms, auditing companies, law firms).	Execution of business activities, obtaining legal advice, execution of audit processes, fulfillment of obligations under contracts made with third parties.
Publicly Available	Areas that can be made public through the internet site, social media platforms, or press releases.	Promotion of MKE A.Ş., public announcement of products and services, fulfillment of legal publication obligations
Business Partners, Suppliers	Institutions collaborated with in processes such as joint projects, business development, sales, and marketing. Third parties providing goods or services on behalf of the Company, operating within the framework of a specific contract.	Business Partners: Execution of business processes, continuation of strategic collaborations, provision of joint services, realization of marketing and sales activities. Suppliers: Provision of goods and services, execution of outsourced services, ensuring the continuity of operational processes.
Authorized Public Institutions and Organizations	Public authorities legally authorized to request information and documents (e.g., courts,	Fulfillment of legal obligations, execution of audit and control



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	regulatory and supervisory institutions, ministries).	duties of public authorities, making legal notifications.
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### 6.8. Transfer of Personal Data Abroad

- Personal data and special categories of personal data may be transferred abroad by the Data Controller if one of the specified conditions is met and if there is a decision of adequacy regarding the country, sectors within the country, or international organizations to which the transfer will be made.
- The decision of adequacy to be taken as a basis is determined by the Authority.
- If there is no adequacy decision, business and transactions are carried out in line with the relevant articles of the Law No. 6698.

### 6.9. Security of Personal Data

MKE A.Ş. takes the necessary measures to prevent illegal access to personal data, prevent illegal processing of personal data, and ensure the storage of personal data, in line with its access authorization policies, and takes administrative and technical measures to prevent data from being accidentally or illegally destroyed, lost, modified, or disclosed outside the allowed access.

MKE A.Ş. monitors the technical measures taken at regular intervals and reviews the technical risks that may arise. Employees are informed about the administrative and technical measures taken in accordance with the Law No. 6698 and relevant legislation and the potential consequences of violating the Instruction.

MKE A.Ş. periodically inspects the data processed in electronic and non-electronic environments in terms of technical measures and measures related to the relevant legal provisions mentioned in the instruction. MKE A.Ş. reviews the administrative and technical measures specified in the relevant legislation at regular intervals, and the security measures that may be included in the scope of data are updated and controlled.

The personal data processor complies with the following obligations to ensure the security of the processed data:

- Acting lawfully and fairly in matters relating to the protection of personal data,
- Processing personal data accurately, completely, and comprehensively,
- Taking the necessary steps to update personal data that is no longer current,
- Notifying the relevant manager when any illegality is detected in the processing of personal data.


### 6.10. Processing of Personal Data Related to Electronic Communication Transactions

The personal data processed during electronic communication transactions are stored in accordance with the security measures specified below:

#### a. Special Rules for Electronic Communication Transactions

Personal data obtained through electronic communications shall be processed in accordance with the rules on the protection and processing of personal data set forth in this Instruction. Persons who process data



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unlawfully by acting contrary to the rules introduced by this Instruction, or who use the information obtained as a result of these activities for other purposes, shall be subject to the provisions of the relevant legislation.

**b. Processing of Personal Data Related to Electronic Communication Transactions Using Mobile Devices**

Mobile phones, laptops, tablets, and similar electronic communication devices provided or that may be provided to employees by MKE A.Ş. may only be used for work purposes. Personal data may be processed in relation to the use of electronic communication devices. Where the data obtained constitutes special category personal data, the provisions of this Instruction regarding the processing of special category personal data shall be taken into account. Employees shall not store or process personal data on electronic communication devices that may fall outside the scope of business purposes and this policy. Otherwise, the employee shall be responsible and the relevant legal provisions shall apply.

**c. Processing of Personal Data Related to Phone Communications**

Communication made via company phones, including the phone numbers called and the duration of the communication, is handled with care to ensure that personal data is used only for the purpose for which it was processed. Where the data obtained constitutes special category personal data, the provisions of this Instruction regarding the processing of special category personal data shall be taken into account. Employees must use their work phones solely for work-related calls and transactions, and MKE A.Ş. shall conduct its operations on this assumption. Otherwise, the employee shall be held responsible, and the relevant legal provisions shall apply.

**d. Processing of Personal Data Related to Internet Use**


Within the framework of legal regulations, if personal data is obtained during employees' use of the internet, the relevant provisions of this Instruction shall apply to the personal data obtained. Employees must use their work computers and other electronic devices only for work-related tasks, and operations shall be conducted on this assumption. Otherwise, the employee shall be held responsible and the relevant provisions of the legislation shall apply.

**e. Processing of Personal Data Related to Security Camera Use**

Camera recordings are used to ensure physical security in the workplace. Personal data obtained may be processed for the purposes of investigating suspicious transactions, resolving disputes, serving as evidence in the event of a complaint, and other matters specified in this Instruction.

**f. Processing of Personal Data Related to Vehicle Use**

The provisions of this Instruction shall apply to the processing of personal data obtained during activities related to vehicles assigned to employees by MKE A.Ş. Employees shall only use company vehicles for work-related purposes, and operations shall be conducted on this assumption. Otherwise, the employee shall be held responsible and subject to the relevant provisions of the legislation.

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### 6.11. Legal Rights and Methods to Exercise These Rights

#### a. Legal Rights of the Data Subject

The rights that can be exercised by Data Subjects within the scope of this Instruction are as follows:

- (1) To learn whether their personal data is processed.
- (2) To request information regarding the processing activities if their personal data has been processed.
- (3) To learn the purpose of processing their personal data and whether they are used appropriately for their purpose.
- (4) To know the third parties to whom their personal data is transferred domestically or abroad.
- (5) To request the correction of their personal data if it is incomplete or incorrectly processed.
- (6) To request the deletion or destruction of their personal data in the event that the reasons requiring its processing have ceased to exist, despite being processed in accordance with Law No. 6698 and other relevant legal provisions, and to request that the transaction carried out within this scope be notified to third parties to whom the personal data has been transferred.
- (7) To object to the emergence of a result against the person himself/herself by analyzing the processed data exclusively through automated systems.
- (8) To demand compensation for the damage in case of damage due to the unlawful processing of personal data.

#### b. Methods of Exercising Legal Rights by the Data Subject

Requests for the processing of personal data are submitted to the Data Controller MKE A.Ş. via the "Data Subject Application Form" and the "Communique on the Principles And Procedures For The Request To Data Controller" in accordance with the procedures and methods specified below:

- Written Application: Can be made in person with a wet signature or through a Notary Public to the address: Emniyet Mahallesi Döğol Cad. No: 2 Anadolu Meydanı 06560 Yenimahalle-ANKARA/TÜRKİYE.
- Application via Registered Electronic Mail (KEP): Can be made with a Registered Electronic Mail (KEP) address to: mkeas@hs01.kep.tr.
- Application via Electronic Mail (e-mail): Can be made with an e-mail containing a mobile signature/e-signature to: kisiselveri@mke.gov.tr.


### 6.12. Administrative and Technical Measures

As the Data Controller, MKE A.Ş. takes all necessary administrative and technical measures in the processing and protection of personal data within the scope of its obligations regarding data security.

#### a. Administrative Measures

- Personal Data Processing Inventory is constantly updated.
- Corporate Instructions regarding the principles of information, training, use, storage, and protection are prepared and implemented.




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- Non-disclosure agreements are actively used.
- Access authorizations of employees are removed in case of a job change or job termination.
- Personal data is sent in a secure format, such as encrypted and with passwords, to third parties via courier.
- Personal data processing and protection politics and procedures are prepared and announced.
- Personal data is quickly reported by the data controller and data processor.
- Periodic internal audits are carried out.
- Security measures are taken against risks in physical environments where personal data is processed.
- Personal data is securely stored in electronic environments against external risks(fire, water, etc.).
- Corporate policies regarding periodic and random audits of the corporate network are prepared and implemented.
- Risk Management processes are carried out.
- Disciplinary regulations are in place for employees who violate the obligation to protect personal data.
- Training and awareness-raising activities are carried out for employees at regular intervals and in an understandable and comprehensive manner.
- A staff position matrix for employees is created.
- Personal data security provisions are included in the signed contracts.

#### **b. Technical Measures**

- Access management is provided.
- Network and application security is provided.
- Effective security measures are taken to transfer personal data via the network.
- Security measures within the scope of development and maintenance of information technology systems are taken.
- Access logs are kept regularly.
- When necessary, mask data is applied.
- Current anti-virus systems are used.
- Firewalls are used.
- The risk of personal data leakage is minimized.
- The security of personal data is increased by creating backups and using redundant and secured personal data systems.
- Penetration and control tests are carried out.
- Log records are kept in a way that is easily accessible and usable.
- Intrusion detection and prevention systems are used.
- Continuous follow-up is ensured for the implementation of security measures specified in the Cyber Security policies.
- Vulnerability scanning is carried out.
- Special categories of personal data transferred via portable memory (USB, CD, DVD) are transferred encrypted.
- Special categories of personal data sent via e-mail or KEP are sent encrypted and with passwords.
- Classification and document management system is available.



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- Information security training and procedures are implemented within the scope of the ISO 27001 Information Security Management System.

## 7. EFFECTIVE DATE

This Instruction shall come into effect from the first business day following the approval date on the signature page.

## 8. APPENDICES

There are no appendices.

## 9. REVISION STATUS CHART

Revision No	Revision Date	Summary of Revision
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