

**CLARIFICATION TEXT
UNDER THE PERSONAL DATA PROTECTION LAW NO.6698**

G. MODIANO YÜN TİCARET A.Ş. (“GMYTAŞ”) has hereby adopted the complete fulfillment of all legal, technical and administrative requirements related to its transactions as one of its corporate policies for collecting, preserving, transferring to third parties, deleting and destroying of all kinds of personal data belonging to natural persons and acquired in any way within the scope of Personal Data Protection Law No.6698 (“Law”) and related primary and/or secondary legislation.

GMYTAŞ, as the data supervisor, has hereby prepared and announced this Clarification Text in order to inform its employees, candidate employees, current and potential customers, employees or customers of group companies including affiliates, its visitors and other real persons in contact with GMYTAŞ regarding the processes of recording, using, sharing, storing, deleting and destroying personal data collected in any way and all the principles related to aforementioned subjects. This text has been prepared for information purposes only and does not intend to give express consent.

1. COLLECTION AND PROCESSING OF PERSONAL DATA

a) COLLECTION METHODS OF PERSONAL DATA

GMYTAŞ obtains personal data through written, verbal or electronic methods and these personal data can be collected when you communicate with our company in writing, verbally or visually, during applications directly to GMYTAŞ or through GMYTAŞ’s affiliates, business partners or other third parties to use the products and services offered by GMYTAŞ, in purchase and sale or supply contract processes, through the organizations that provides/receives service, all within the scope of labor law relationship or when you communicate with GMYTAŞ on a subject other than those mentioned above.

b) PROCESSING PERSONAL DATA AND PROCESSING PURPOSES

The processing of your personal data, covers all activities in the process starting from the acquisition of personal data electronically or non-electronically (e.g. physical documents), and includes storing, preserving, changing, rearranging, disclosing, transferring, taking over, making it accessible, classifying or preventing the use of this personal data, up to the deletion, destruction or anonymization of data.

GMYTAŞ provides your personal data obtained through the methods and methods specified in paragraph a) of this text by the relevant business units in order to carry out the commercial activities, to carry out the purchase and sale processes of goods or services, to improve business processes, to follow up finance, to conduct account and legal affairs, to assure information security, to carry out general communication activities, to provide physical space security, to carry out emergency management processes, to carry out the application processes for employee candidates, to fulfill the obligations arising from the employment contract and legislation for employees, to perform all other human resources processes, to perform occupational health and safety activities, in order to provide information to authorized persons, institutions and authorities, to comply with the legal legislation to which GMYTAŞ is subject, based on the express consent condition specified in Articles 5/1 and 6/2 of the Law and without seeking express consent in the following cases.

Article 5/2:

- a) *It is clearly stipulated in the laws.*
- b) *It is compulsory for the protection of 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.*
- c) *It is necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the establishment or performance of a contract.*
- ç) *It is mandatory for the data supervisor to fulfill his legal obligation.*
- d) *It is made public by the person concerned.*
- e) *Data processing is mandatory for the establishment, use or protection of a right.*
- f) *It is mandatory for the legitimate interests of the data supervisor, provided that the fundamental rights and freedoms of the data subject are not harmed.*

Article 6:

(3) Personal data other than health and sexual life listed in the first paragraph may be processed without seeking the explicit consent of the person concerned in cases stipulated by the law. Personal data relating to health and sexual life, on the other hand, can only be processed by persons under the obligation of secrecy or authorized institutions and organizations for the purpose of protecting public health, conducting preventive medicine, medical diagnosis, treatment and care services, planning and managing health services and financing, without seeking the express consent of the person concerned.

2. TRANSFER OF PROCESSED PERSONAL DATA TO THIRD PARTIES

Your personal data obtained by GMYTAŞ is for the purpose of the service provided/received, and as we are a company within the scope of the “processing purposes” specified in Article 1 b) above and our headquarters is in England, the aforementioned personal data shall only be transferred to G. MODIANO LIMITED company in England, our business partners, authorized employees within the scope of the collection and storage of personal data in our company, our suppliers associated to you, legally authorized public institutions and private persons, within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the Law. Nevertheless, it cannot be assigned to third parties for commercial purposes nor transferred to third parties for any other reason than those listed above.

3. RIGHTS OF PERSONAL DATA OWNERS IN ACCORDANCE WITH PERSONAL DATA PROTECTION LAW

If you submit your requests regarding your personal data processed by GMYTAŞ to us through the following means, your application will be answered free of charge within thirty days at the latest, depending on the nature of the request. However, if the nature of your application or the Personal Data Protection Board stipulates, a fee may be charged. In accordance with Article 11 of the Law, the rights of personal data owners are as follows:

- To learn whether personal data is processed,
- To request information whether personal data 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 whom personal data are transferred domestically or abroad,

- To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data are transferred,
- To request the deletion or destruction of personal data in the event that the reasons requiring its processing are no longer valid, despite the fact that it has been processed in accordance with the provisions of the PDP Law and other relevant laws, and to request notification of the transaction made within this scope to third parties to whom the personal data has been transferred,
- To object to the occurrence of a result against the person himself by analyzing the processed data exclusively through automated systems,
- In case of damage due to unlawful processing of personal data, they also have the right to demand the compensation of the damage.

In accordance with Article 13/1 of the Law, you can make an application in order to exercise your aforementioned rights and send your application to GMYTAŞ in writing or by other methods to be determined by the Personal Data Protection Board.

In order to use your rights stated above, you can send your request including which of the rights specified in Article 11 of the Law or which you request to use, by filling in the form announced at <https://www.gmodiano.com/> and send a signed copy to address "GMYTAŞ, Ömer Avni Mh. İnebolu Sokak No. 13 Malatya Apt. Kat 3 D.3 Kabataş, İstanbul", you can deliver the documents and information in person, send them via notary public or other methods specified in PDPL or send the relevant form and documents to admintr@gmodiano.com with secure electronic signature.

4. UPDATING THE CLARIFICATION TEXT

GMYTAŞ reserves the right to review, update, modify, renew and change this clarification text and personal data processing method from time to time. In case of any updates, the Current Clarification Text and policies will be published on the website at <https://www.gmodiano.com/>. Updated terms shall take effect as of the publication date.

5. COMMUNICATION

If you have any questions, suggestions, any other request regarding our PDP Policy or other data protection practices, you can contact us via the addresses below.

Personal Data Owners should send their questions, opinions or requests in writing to their e-mail address. In this case, a written reply will be given within 30 days.

- E-Mail: kvkk@gmodiano.com
- Cap Address: gmodiano@hs06.kep.tr
- Contact Address: Ömer Avni Mh., İnebolu Sokak No. 13, Malatya Apt.
Kat: 3 D: 3, 34427 Kabataş, Beyoğlu, İstanbul
- Phone Number: 0212 251 11 60

This information letter has been hereby prepared in order to fulfill the disclosure obligation in accordance with Article 10 of the PDPL.