

UMDASCH MADOSAN RAF SİSTEMLERİ SANAYİ VE TİCARET A.Ş.

PERSONAL DATA PROTECTION AND PROCESSING POLICY

Version 0.2

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1. INTRODUCTION

1.1. Purpose and Scope of the Policy

1. Law No. 6698 on the Protection of Personal Data (the "**Law**") entered into force on April 7, 2016; hereby "**umdasch Madosan Raf Sistemleri Sanayi ve Ticaret A.Ş.**" Processing and Protection of Personal Data Policy ("**Policy**"), umdasch Madosan Raf Sistemleri Sanayi ve Ticaret A.Ş. ("**umdasch Madosan**" or the **Company** ") will be complied with in compliance with the Law and in fulfilling the obligations related to the protection and processing of personal data by the Company. It aims to determine the principles.

The policy determines the processing conditions of personal data and sets out the main principles adopted by the Company in the processing of personal data. In this context, the Policy covers all personal data processing activities under the Law by the Company, the owners of all personal data processed by the Company and all personal data processed.

Matters regarding the processing of personal data of **company employees** are not covered by this Policy, and are regulated separately in the umdasch Madosan Employee Personal Data Processing and Protection Policy.

Definitions regarding the terms used in the policy are available in ANNEX-1.

1.2 Effectiveness and Amendment

The policy has been made public by the Company on its website. In case of conflict with the current legislation, especially the Law, and the regulations included in this Policy, the provisions of the legislation are applied.

The Company reserves the right to make changes in the Policy in line with the legal regulations. The updated version of the policy can be accessed on the Company website, umdasch-madosan.com, and shop.madosan.com.tr.

2. ACTIVITIES OF OUR COMPANY

- **Within the scope of the company's quality assurance activities**, personal data can be processed due to obtaining quality certificates.
- **Within the scope of engineering and technology unit activities**, personal data can be processed in R&D processes.
- **In planning and logistics activities**; Personal data related to the persons involved in the process of delivery of goods, receipt of goods, storage and receipt of waybills are processed.
- **Within the scope of the company's production activities**, personal data regarding the employee contributing to the production activities can be processed.
- **Within the scope of the company's purchasing and sales processes**, personal data of the relevant persons participating in this process can be processed for the purposes of conducting communication activities, carrying out order, sales and purchasing processes, and tracking marketing activities and can be shared with third parties involved in this process. In this case, additional measures are taken. Personal data are processed with the supplier information form in order to operate and maintain the supply chain.

- **Within the scope of information technologies activities**, all data such as communication, e-mail and internet traffic tracking and e-mail content can be processed by the Company within the scope of the Law No. 5651 on "Regulation of Publications Made on the Internet and Fight Against Crimes Committed Through These Publications".

- The company receives server, software, hardware, maintenance support from third party service providers, and can share personal data by taking necessary security measures. Personal data can be processed and stored electronically through software and hardware used by the company.

- **Within the framework of financial and accounting activities**, carrying out contract processes with banks, making payments, issuing declarations, issuing invoices, processing, collections, carrying out company management activities, conducting financial audits, conducting incentive processes, conducting processes with notaries and similar public institutions Your personal data can be processed and shared during the process.

- Personal data can be processed **in administrative affairs processes**, organization and realization of activities.

- Personal data are processed **by recording cameras** in indoor and outdoor areas with security cameras.

- Due to the establishment of contracts with OSGB and other contractors and subcontractors from which services are provided, personal data of subcontractor employees can be processed.

- Personal data can be processed within the scope of domestic or international travel organizations of employees, and the information of employees who give approval can be shared with suppliers.

- **Personal data are processed while keeping visitor records.**

- **During the execution of Personnel and Human Resources activities**

- **During the receipt of job applications**, personal data of employee candidates are processed.

- **During the creation of personal files within the scope of personnel affairs**, personal data regarding the employee's family can be processed. For example, information about the family of the employee is processed while filling the family status notification form. Personal data of third parties can be obtained during receiving and replying to wage attachment warrants.

- **Within the scope of finance and accounting activities**, performing banking transactions, processing payments and collections, purchase invoices, issuing a sales invoice, preparing a return invoice, preparing an expense slip, giving a withholding tax return, tax return, stamp tax, sending ba-bs forms, company employees and Personal data are processed during the submission of invoices and receipts related to the expenditures made by the officials to accounting, transferring the export invoices to the customs firm, submission of declarations and application of incentives. An introduction form is created and kept in order to ensure continuity for customers and suppliers.

- **Within the scope of the activities of the board of directors**, personal data of the shareholder, the board of directors and the employee can be processed and transferred to the relevant institutions during the execution of the general processes, the preparation of the management activity report, the preparation of the general assembly meeting minutes, the trade registry activities, the signature circular processes.

- Data obtained within the scope of providing information to authorized public institutions and organizations, lawyers and consultants on issues such as transferring work to a contracted lawyer due to the **execution of management activities**, establishing contracts with approved law firms and certified public accountants and independent audit firms can be transferred.
- Data obtained within the scope of the activities of **conducting inspections** and providing information to authorized public institutions and organizations can be transferred.
- During the appointment of the contracted lawyer in order to carry out **legal transactions**, transfer of information and documents, personal data can be transferred for limited purposes.
- Personal data are processed while receiving and responding to the **applications of the relevant person**.
- **Within the framework of marketing activities**, personal data can be processed in the receiving and recording of customer information, carrying out bidding processes and pre-order processes. Advertising activities are carried out in order to contribute to the company's marketing processes, and images such as photographs can be shared on the website and similar platforms. In this case, the consent of the relevant persons is obtained.
- **In the project management and sales processes**, project management within the company, support of the sales team for proposing new products to the customer and drawing projects, personal data can be processed during the execution of customer relations in the assembly works of the company.
- **During the administration of the website**, collecting the records from the "register to our e-mail list" section from the website, sharing the resumes of the Chairman of the Board, Board Member and General Manager on the website, filling out the satisfaction questionnaire, Sharing the photos of the events as news on the website, Personal data can be processed while providing live support.
- Marketing data is processed through the collection of cookies such as mandatory cookies, functionality and preference cookies, performance and analysis cookies, targeting or advertising cookies on the website.
 - **Within the scope of e-commerce activities**,
 - Personal data are processed during the receipt of customer orders through marketplace customers, opening a current account with customer data received with the order, performing invoice transactions, and completing cargo processes.
 - Performing sales activities without membership on the website in Corporate and Individual sales,
 - Receiving payment via money order and contracted institutions on the website in corporate sales
 - Receiving payment by credit card in agreement with,
 - Creating a distance sales contract and preliminary information form,
 - Sending customer information to the contracted cargo company for customer orders received through the website,
 - Personal data is processed within the scope of product return activities.

3. DATA OWNERS, DATA PROCESSING PURPOSES AND DATA CATEGORIES FOR THE PERSONAL DATA PROCESSING ACTIVITIES OF OUR COMPANY

3.1. Data Owners

The data owners within the scope of the policy are all natural persons except the Company employees whose personal data is processed by the Company. In this context, generally the categories of data subjects are as follows:

DATA OWNER CATEGORIES		DESCRIPTION
1	Employee Candidate	Real persons who apply for a job by sending a CV or other methods to the company
2	Working Family	Family members of employees in the company
3	Intern	Employees who are legally intern in the company
4	Customer / Product or Service Receiver	Real person who is selling goods and services directly from the internet or from stores
5	Customer Employee	Regardless of whether they have a contractual relationship with the company, natural persons whose personal data are obtained or employees of customers with a contractual relationship
6	Customer Executive	Authorities of legal person customers or real person customer himself
7	Potential Customer	Real persons or employees of legal entities who are likely to sell goods / services in the future
8	Supplier Employee	Employees of companies from which the company purchases products or services
9	Supplier Executive	Authorities of companies from which the company purchases products or services
1	Board of Directors	Real persons who are members of the company's board of directors
1	Signatories	Real persons authorized to sign the company
1	Shareholder	Shareholder / partner natural persons of the company
1	Third Person	Natural persons other than Company employees and the categories of data subjects listed above
1	Visitor / Web Visitor	Third parties who enter the company building and those who visit the website

Data subject categories are specified for general information sharing. The fact that the data owner does not fall within the scope of any of these categories does not eliminate the data owner qualification as specified in the Law.

3.2. Personal Data Processing Purposes

Your personal data and special quality personal data can be processed by the Company for the following purposes in accordance with the personal data processing conditions in the Law and the relevant legislation:

- Execution of Emergency Management Processes
- Execution of Information Security Processes
- Execution of Employee Candidate / Intern / Student Selection and Placement Processes
- Execution of Employee Candidates' Application Processes
- Fulfillment of Obligations Arising from Employment Contract and Legislation for Employees
- Conducting Audit / Ethical Activities
- Execution of Access Authorities
- Conducting Activities in Compliance with Legislation
- Execution of Finance and Accounting Affairs
- Ensuring Physical Space Security
- Following and Execution of Legal Affairs
- Conducting Communication Activities
- Execution / Supervision of Business Activities
- Planning of Human Resources Processes
- Conducting Occupational Health / Safety Activities
- Execution of Logistics Activities
- Execution of Goods / Service Purchase Processes
- Execution of Goods / Service After Sales Support Services
- Execution of Goods / Service Sales Processes
- Conducting Activities for Customer Satisfaction
- Organization and Event Management
- Conducting Marketing Analysis Studies
- Execution of Advertising / Campaign / Promotion Processes
- Execution of Risk Management Processes
- Execution of Custody and Archive Activities
- Execution of Contract Processes
- Tracking of Requests / Complaints
- Ensuring the Security of Movable Goods and Resources
- Execution of Supply Chain Management Processes
- Ensuring the Security of Data Controller Operations
- Informing Authorized Person Institutions and Organizations
- Conducting Management Activities
- Creating and Tracking Visitor Records

3.3. Categories of Personal Data

Your personal data categorized below by the company are processed in accordance with the personal data processing conditions in the Law and the relevant legislation:

PERSONAL DATA CATEGORIZATION	DESCRIPTION
Identity Information	All information regarding the identity of the person on documents such as driver's license, identity card, residence, passport, lawyer identity, marriage certificate, and title, plate
Communication information	Information regarding communication with the data subject such as phone number, address, e-mail
Location	Location information of where people are located

Personality	Personal data (all kinds of information and documents required to be entered in the personal file as required by law and workplace policies) Payroll information, Disciplinary investigation, Recruitment document records, Property declaration information, CV information, Performance evaluation reports, occupational health and safety Body knowledge, personality and leadership test results obtained for PPE to be distributed within the scope of its activities
Legal action	Personal data processed within the scope of the determination, follow-up of our legal receivables and rights and the execution of our debts and compliance with our legal obligations and our company's policies
Customer Transaction	Information obtained and produced about the person concerned as a result of our commercial activities and operations carried out by our business units within this framework
Physical Space Security	Personal data regarding records and documents such as camera recordings taken during the entrance to the physical space, during the stay in the physical space
Transaction Security	Your personal data processed to ensure our technical, administrative, legal and commercial security while conducting our commercial activities
Risk management	Data on information security
Financial Information	Personal data processed regarding information, documents and records showing all kinds of financial results created according to the type of legal relationship our company has established with the personal data owner,
Professional experience	Data on the experiences of individuals who have applied to be an employee of our company or who have been evaluated as employee candidates in line with the human resources needs of our company or who are in a working relationship with our Company in accordance with commercial practices and honesty rules.
Marketing	Data obtained as a result of surveys, marketing studies, cookie records, etc. data
Visual and Audio Records	Data regarding camera records, photo or video recordings kept in our company
Criminal Convictions and Security Measures	It is a criminal record.
Health	All kinds of health information pertaining to an identified or identifiable natural person.
Special Quality Data	It is a personal data of special nature with data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, attire and attire, association, foundation or union membership, health, sexual life, criminal conviction and security measures.

4. PRINCIPLES AND CONDITIONS FOR THE PROCESSING OF PERSONAL DATA

4.1. Principles Regarding Processing Personal Data

Your personal data is processed by the company in accordance with the personal data processing principles in Article 4 of the Law. These principles must be followed in terms of each personal data processing activity:

- **Processing of personal data in accordance with the law and good faith;** The company acts in accordance with the laws, secondary regulations and general principles of law in the processing of your personal data; It attaches importance to processing personal data limited to the purpose of processing and considering the reasonable expectations of data owners.
- **Personal data being accurate and up to date;** It is paid attention to whether your personal data processed by the company is up-to-date and that controls are made. In this context, data owners are entitled to request correction or deletion of their correct and outdated data.
- **Processing of personal data for specific, explicit and legitimate purposes;** The company determines the data processing purposes before each personal data processing activity and takes care that these purposes are not illegal.
- **Being connected, limited and measured with the purpose of processing personal data;** The data processing activity of the company is limited to the personal data necessary for the realization of the collection purpose and necessary steps are taken to prevent the processing of personal data not related to this purpose.
- **Retention of personal data for the period required by legislation or processing purposes;** Personal data are deleted, destroyed or anonymized after the purpose of personal data processing by the company disappears or the period stipulated in the legislation expires.

4.2. Conditions Regarding Processing of Personal Data

Your personal data is processed by the company in the presence of at least one of the personal data processing conditions specified in Article 5 of the Law. Explanations regarding these conditions are as follows:

The explicit consent of the personal data owner, where there are no other data processing conditions, 3.1. In accordance with the general principles given under the heading, the personal data of the data subject can be processed by the Company with the free will of the data subject, with sufficient knowledge of the personal data processing activity, without any hesitation and only if he gives his consent limited to that transaction.

- **If the personal data processing activity is explicitly stipulated by the laws,** the personal data may be processed by the Company without the explicit consent of the data owner. In this case, the Company will process personal data within the framework of the relevant legal regulation.

- **In case the explicit consent of the data owner cannot be obtained due to the actual impossibility and the personal data processing is mandatory,** the personal data belonging to the data owner who is unable to disclose his consent by the Company or whose consent cannot be validated, personal data processing in order to protect the life or body integrity of the data owner or a third person will be processed if required.

- **If the personal data processing activity is directly related to the establishment or execution of a contract**, personal data processing activity will be carried out if it is necessary to process the personal data of the parties to the contract established or already signed between the data owner and the Company.
- **In case it is necessary to carry out personal data processing activities** in order to fulfill the legal obligation of the data controller, the Company processes personal data in order to fulfill its legal obligations under the current legislation.
- **The fact that the data owner has made his personal data public**, has been disclosed to the public in any way by the data owner, and the personal data that has been made public as a result of publicization may be processed by the Company, even without the explicit consent of the data owners, with the aim of making it public.
- **In the event that it is compulsory to process personal data for the establishment**, use or protection of a right, the Company will be able to process the personal data of the data subject without the explicit consent of the data subjects within the scope of the obligation.
- **Provided that it does not harm the fundamental rights and freedoms of the data owner**, if data processing is necessary for the legitimate interests of the data controller, personal data may be processed by the Company, provided that the balance of interests of the Company and the data subject is observed. In this context, in the processing of data based on legitimate interests, the Company first determines the legitimate interest to be obtained as a result of the processing activity. It evaluates the possible effect of the processing of personal data on the rights and freedoms of the data subject and if it is of the opinion that the balance is not disturbed, it performs the processing activity.

3.3. Conditions Regarding Processing Special Quality Personal Data

In article 6 of the Law, special quality personal data is specified in a limited number. These; It is a person's race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, costume and dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data.

The Company can process special quality personal data by taking additional measures determined by the Personal Data Protection Board in the following situations:

- **Processing of sensitive personal data other than health and sexual life** can be processed if the data owner gives his explicit consent or if it is explicitly stipulated in the law.
- **Personal data related to health and sexual life** can only be kept open to the data subject by persons under the obligation of confidentiality or authorized institutions and organizations for the purpose of protecting public health, performing preventive medicine, medical diagnosis, treatment and care services, planning and managing health services and financing. can be processed without seeking

See the Policy on Protection and Processing of Special Quality Personal Data.

5. TRANSFER OF PERSONAL DATA

In accordance with the additional regulations listed in Articles 8 and 9 of the Law and determined by the Personal Data Protection Board; In case there are conditions for transferring personal data, it can transfer personal data domestically or abroad.

- The transfer of personal data to third parties in the country, in the presence of at least one of the data processing conditions specified in Article 5 and 6 of the Law and explained under Title 3 of this Policy, and provided that the basic principles of data processing are complied with the Company. can be transferred by.
- The transfer of personal data abroad to third parties, in the absence of the express consent of the person, in the presence of at least one of the data processing conditions specified in Article 5 and 6 of the Law and under Title 3 of this Policy, and the basis for data processing conditions. Your personal data can be transferred abroad by the Company, provided that it complies with the principles.

If the country to which the transfer will be made is not among the safe countries to be announced by the Personal Data Protection Board, upon the Company and the data controller in the relevant country undertaking sufficient protection in writing, the Personal Data is Personal data may be transferred abroad to third parties in the presence of at least one of the data processing conditions (see Policy 3. Title).

Within the general principles of the Law and the data processing conditions specified in Articles 8 and 9, the Company is able to transfer data to the parties categorized in the table below:

SHARED PARTY CATEGORIZATION	SCOPE	PURPOSE OF TRANSFER
Kanunen Yetkili Kamu Kurumu	Public institutions and organizations legally authorized to receive information and documents from the Company	Limited personal data sharing of relevant public institutions and organizations for the purpose of requesting information
Kanunen Yetkili Özel Kurum	Private law persons legally authorized to receive information and documents from the Company	Sharing of data limited to the purpose requested by the relevant private law persons within the legal authority

SHARED PARTY CATEGORIZATION	SCOPE	PURPOSE OF TRANSFER
Legally Authorized Public Institutions and Organizations	Public institutions and organizations legally authorized to receive information and documents from the Company	Limited personal data sharing of relevant public institutions and organizations for the purpose of requesting information
Private Law Real / Legal Persons	Real persons or private law legal persons	Limited data transfer in order to provide the service
Open to everyone	Social Media, Web Site, Company visual / printed publications	Data sharing limited to the stated purposes, with the consent of the relevant person
Shareholders	Shareholder / partner natural persons of the Company	Limited data sharing within the scope of management authority

Suppliers	Real persons or private law legal persons	Limited data transfer in order to receive the service
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The company performs data transfer for the following purposes and for legal reasons;

Purposes

- Conducting Activities in Compliance with Legislation
- Execution of Finance and Accounting Affairs
- Ensuring Physical Space Security
- Legal Obligation
- Conducting Communication Activities
- Execution of Logistics Activities
- Execution of Goods / Services After Sales Support Services Execution of Activities for Customer Satisfaction
- Organization and Event Management
- Conducting Marketing Analysis Studies
- Execution of Advertising / Campaign / Promotion Processes
- Execution of Contract Processes
- Ensuring the Security of Movable Goods and Resources
- Execution of Supply Chain Management Processes
- Informing Authorized Persons, Institutions and Organizations
- Conducting Management Activities

Legal Reasons

1. Personal data processing is clearly stipulated in the laws
2. The personal data processing activity is directly related to the establishment or performance of a contract.
3. It is necessary to carry out personal data processing activity in order to fulfill the legal obligation of the data controller.
4. When personal data processing is mandatory for the establishment, use or protection of a right
5. If data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data owner.

6. DISCLOSURE OF DATA OWNERS AND RIGHTS OF DATA OWNERS

According to Article 10 of the Law, data owners should be informed about the processing of personal data before the processing of personal data or at the time of processing personal data at the latest. In accordance with the relevant article, the necessary internal structure has been established in order to enlighten the data owners in every case of personal data processing by the Company as the data controller. In this context;

- For the purpose of processing your personal data, please see 2.2. see the section.

- For the parties to which your personal data is transferred and for the purpose of transfer, please review the 4th part of the Policy.
- In order to examine the conditions regarding the processing of your personal data that can be collected in physical or electronic environments through different channels, please refer to Section 3.2 and 3.3 of the Policy. See section.
- As a data owner, we would like to state that you have the following rights in accordance with Article 11 of the Law:
 - - Learning whether your personal data is processed,
 - - If your personal data has been processed, to request information regarding this,
 - - Learning the purpose of processing your personal data and whether they are used appropriately for their purpose,
 - - To know the third parties in the country or abroad to whom your personal data is transferred,
 - - To request correction of your 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 your personal data has been transferred,
 - - Despite the fact that it has been processed in accordance with the Law and other relevant provisions of the law, to request the deletion or destruction of personal data in the event that the reasons for its processing disappear, and to request notification of the transaction made within this scope to third parties to whom your personal data has been transferred,
 - - To object to this in case of a result against you by analyzing the processed data exclusively through automated systems,
 - - To request the compensation of the damage in case you suffer damage due to the illegal processing of your personal data.

You can submit your applications regarding your rights listed above to our Company by filling out the Data Owner Application Form, which you can access on umdasch-madosan.com and shop.madosan.com.tr. Depending on the nature of your request, your applications will be concluded free of charge as soon as possible and within thirty days at the latest; However, if the transaction requires additional costs, you may be charged according to the tariff determined by the Personal Data Protection Board.

During the evaluation of the applications, the company first determines whether the claimant is the real beneficiary or not. However, when the company deems necessary, it may request detailed and additional information in order to better understand the request.

Responses to data subject applications are notified to data owners in writing or electronically by the company. If the application is rejected, the reasons for rejection will be explained to the data owner with justifications.

If personal data are not obtained directly from the data owner; (1) within a reasonable time from the acquisition of personal data, (2) during the initial communication if the personal data will be used for the purpose of communication with the data owner, (3) if the personal data will be transferred, at the latest for the first time Activities are carried out to enlighten data owners during the transfer.

7. DELETING, DESTRUCTING, ANONYMIZING PERSONAL DATA

Although it has been processed in accordance with the law in accordance with Article 7 of the Law, in the event that the reasons for its processing disappear, the Company deletes, destroys or anonymizes the personal data ex officio or upon the request of the data owner, in accordance with the guidelines published by the Authority.

8. RESTRICTIONS ON SCOPE AND APPLICATION OF THE LAW

The following situations are out of the scope of the Law:

- The processing of personal data by real persons within the scope of activities related to them or their family members living in the same residence, provided that they are not given to third parties and obligations regarding data security are complied with.
- Processing personal data for purposes such as research, planning and statistics by making them anonymous with official statistics.
- Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, public order, economic security, privacy of private life or personal rights or constitute a crime.
- Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order or economic security.
- Processing of personal data by judicial authorities or execution authorities in relation to investigation, prosecution, trial or execution proceedings.

The Company does not need to inform the data owners in the cases listed below, and the data owners will not be able to use their rights specified in the Law, except for their rights to compensate their damages:

- Processing of personal data is necessary for the prevention or investigation of a crime.
- Processing personal data made public by the person concerned.
- The processing of personal data is necessary for the execution of supervision or regulation duties and disciplinary investigation or prosecution by the authorized and authorized public institutions and organizations and professional organizations having the status of public institutions, based on the authority granted by the law.
- Processing of personal data is necessary for the protection of the economic and financial interests of the State regarding budget, tax and financial issues.

ANNEX-1: DEFINITIONS

DEFINITION	
Personal Data	All kinds of information about an identified or identifiable natural person.
Special Quality Personal Data	It refers to data on race, ethnicity, political views, philosophical belief, religion, sect or other beliefs, dress and dress, association, foundation or union

	membership, health, sexual life, criminal conviction and security measures, and biometric data.
Personal Health Data	Any health information pertaining to an identified or identifiable natural person.
Data subject / Relevant Person	Real person whose personal data is processed
Processing of Personal Data	Obtaining, recording, storing, preserving, changing, reorganizing, disclosing, transferring, taking over, making available, classifying or using personal data through fully or partially automatic means or non-automatic means provided that they are part of any data recording system. all kinds of operations performed on data such as blocking.
Open Consent	Consent on a specific subject, based on information and expressed with free will
Data Supervisor	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 recording system.
Data Processor	Real and legal person who processes personal data on behalf of the data controller based on the authority given
Personal Data Processing Inventory	Personal data processing activities of umdasch Madosan, which data controllers carry out depending on the business processes; the inventory that is created by associating with the personal data processing purposes, the data category, the recipient group and the data subject group, and detailed the maximum period required for the purposes for which the personal data is processed, the personal data foreseen to be transferred to foreign countries and the measures taken regarding data security
KVK Law	Personal Data Protection Law dated 24 March 2016 and numbered 6698
Constitution	No. 2709 Constitution of Turkey
KVK Board	Personal Data Protection Board Authority
KVK Institution	Personal Data Protection Authority
Policy	umdasch Madosan Personal Data Processing and Protection Policy
Company / umdasch Madosan	umdasch Madosan Raf Sistemleri Sanayi ve Ticaret A.Ş.
Work partners	Persons with whom the company has established partnerships within the scope of contractual relations within the framework of its commercial activities.

ANNEX-2:

DATA RECEIVER GROUPS	
Legally Authorized Public Institutions and Organizations	From public institutions and organizations legally authorized to receive information and documents from the Company; SGK ÇSGB İŞKUR KOSGEB GİB TSO Notary Tax Administration Trade Registry Office Enforcement Directorate Courts Related Ministries Law Enforcement
Real Persons and Private Law Legal Persons	Customers
Open to everyone	Social media Website
Shareholders	Shareholder / partner natural persons of the Company
Suppliers	Shipping Companies Travel Agencies Advertising agency Lawyer / Consultant Bank Audit Company Customs Consultancy Financial Consultancy