#### PERSONAL DATA PROTECTION AND PRIVACY POLICY

Nevodis Kimya San.ve Tic.Ltd.Şti. takes the highest level of security measures to ensure your personal data is collected, stored, and shared in accordance with the law, and to protect your privacy.

Our goal, in compliance with Article 10 of the Personal Data Protection Law No. 6698 and in line with your satisfaction, is to inform you in the most transparent manner about the ways your personal data is collected, the purposes of processing, the parties with whom it is shared, the legal reasons, and your rights.

# I. Identity of the Data Controller and Its Representative (if any):

According to the Personal Data Protection Law No. 6698 ("Law No. 6698"), your personal data will be collected and processed by Nevodis Kimya San.ve Tic.Ltd.Şti., as the data controller, within the scope described below.

# II. Purpose of the Personal Data Protection and Processing Policy

Due to the sensitive nature of our company's operations, information obtained from visitors, customers, or potential customers is kept confidential and is not shared with third parties. Protecting personal data is a fundamental policy of our company. In this context, we commit to fulfilling all our obligations under national legislation.

# III. Scope and Modification of the Personal Data Protection and Processing Policy

This policy of our company has been prepared in accordance with the Personal Data Protection Law No. 6698 ("KVKK"). The data obtained from you, either with your consent or on other legal grounds specified in the Law, will be used to enhance the quality of services provided to you, and to improve our services and quality policy. Additionally, some of our data will be anonymized and used for statistical purposes, not subject to our practices or laws. The aim of the Personal Data Protection and Processing Policy is to include provisions for the protection of the data of our customers, potential customers, employees, and those in partnership solutions, whether obtained automatically or not. Our company reserves the right to change its policies and regulations to ensure compliance with the law and better protection of personal information.

# IV. Basic Principles Related to the Processing of Personal Data

As the owner of personal data, if you submit a request regarding the rights listed below, Nevodis Kimya San.ve Tic.Ltd.Şti. will fulfill the request as soon as possible and within at most 30 days, depending on the nature of the request.

In this context, personal data owners have the right to:

- Learn whether their personal data has been processed.
- Request information if their personal data has been processed.
- Know the purpose of processing their personal data and whether it is used accordingly.
- Be informed about the third parties to whom personal data is transferred domestically or internationally.
- Request correction of personal data if it is incomplete or inaccurately processed and request that the correction is notified to the third parties to whom the personal data has been transferred.
- Request the deletion or destruction of personal data if the reasons for its processing no longer exist, even though it has been processed in accordance with Law No. 6698 and other relevant laws, and

request that the process carried out in this context is notified to the third parties to whom the personal data has been transferred.

- Object to unfavorable results produced about themselves through the analysis of processed data exclusively by automated systems.
- Request compensation for damages resulting from the unlawful processing of personal data.

You can submit your requests related to exercising the aforementioned rights in accordance with paragraph 1 of Article 13 of Law No. 6698 and the Communique on Procedures and Principles for Application to Data Controller, published in the Official Gazette No. 30356 on 10.03.2018, in Turkish and in writing, or via registered electronic mail (KEP) address, secure electronic signature, mobile signature, or by using the previously notified and system-registered email address of Nevodis Kimya San.ve Tic.Ltd.Şti...nevodis@hs01.kep.tr. Information will only be provided regarding the individual making the application; it will not be possible to obtain information about other family members and third parties. Nevodis Kimya San.ve Tic.Ltd.Şti. reserves the right to verify your identity before responding.

#### **Principle of Maximum Saving**

According to the saving principle, information received by Nevodis Kimya San.ve Tic.Ltd.Şti. is processed into the system only as necessary. Therefore, the information we collect is determined by its purpose. No unnecessary information is collected. Other information transferred to Nevodis Kimya San.ve Tic.Ltd.Şti. is similarly transferred to the company's information systems. Excess information is not recorded in the system, it is deleted or anonymized. These data can be used for statistical purposes.

#### **Deletion of Personal Data**

Nevodis Kimya San.ve Tic.Ltd.Şti. deletes, destroys, or anonymizes personal data automatically or upon the individual's request after the legal retention periods, the completion of legal processes, or other requirements have been met, and in any case, within 5 years after the data processing.

# **Accuracy and Data Currency**

Data within Nevodis Kimya San.ve Tic.Ltd.Şti. are processed as declared by the individuals concerned. Nevodis Kimya San.ve Tic.Ltd.Şti. does not bear the responsibility to investigate the accuracy of the data provided by the individuals. Declared data are considered accurate. The principle of data accuracy and currency is also adopted by Nevodis Kimya San.ve Tic.Ltd.Şti. The company updates personal data based on official documents received or upon the individual's request. Necessary measures are taken for this.

## **Privacy and Data Security**

Personal data is confidential, and Nevodis Kimya San.ve Tic.Ltd.Şti. adheres to this confidentiality. Only authorized personnel within the company can access personal data. The company takes all necessary technical and administrative measures to protect the personal data collected, to prevent it from falling into unauthorized hands, and to prevent any harm to visitors and members. This includes ensuring the compliance of software with standards, careful selection of third parties, and adherence to the company's data protection policy.

# V. Purposes of Data Processing

The processing of personal data of visitors/members, including but not limited to identity verification and related legal obligations, is necessary for our business units to perform the required tasks and implement appropriate business processes for individuals to benefit from the products and services offered by Nevodis Kimya San.ve Tic.Ltd.Şti. and its affiliated group companies; ensuring the legal, technical, commercial, and financial security of Nevodis Kimya San.ve Tic.Ltd.Şti. and those who are in commercial relations with it; recommending and promoting the products and services offered by Nevodis Kimya San.ve Tic.Ltd.Şti., planning and implementing the necessary activities for the stakeholders, and customizing them according to the likes, usage habits, and needs of the stakeholders; conducting necessary research in our related business units for the execution of Nevodis Kimya San.ve Tic.Ltd.Şti.'s activities and related business processes, including sharing this information with group companies. Your personal data may vary depending on the service, product, or business offered by Nevodis Kimya San.ve Tic.Ltd.Şti.; it can be collected verbally, in writing, or electronically through offices, branches, dealers, call centers, websites, social media channels, mobile applications, and similar means. Your personal data will be processed as created and updated while you benefit from our company's services.

### VI. Data of Visitors, Members, and Business and Solution Partners

When a contractual relationship is established with our visitors and members, the collected personal data can be used without the consent of the Member, but this use will be in accordance with the purpose of the contract. Information is used to better fulfill the requirements of the contract and services and is updated as needed by contacting us. On the other hand, the information left by our members is processed to later provide them with easier and better services. This information will be deleted upon request unless it turns into a contractual relationship.

## **Data of Business and Solution Partners**

Nevodis Kimya San.ve Tic.Ltd.Şti. follows the principle of legal transaction in sharing information with its business and solution partners. Information is shared with business and solution partners confidentially and only to the extent required by the service, and these parties are required to take measures to ensure data security.

## **Data Processing for Advertising Purposes**

Promotional electronic messages may be sent to individuals. Data processing carried out due to the company's legal obligation or explicitly provided by the law can be conducted without further consent if personal data processing is explicitly stipulated by the relevant legislation or to fulfill a legal obligation. The type and scope of data processing must be necessary for data processing allowed by the laws and must comply with the relevant provisions of the law.

# **Company Data Processing**

Personal data can be processed in accordance with the services offered by the company and its legal purposes. However, data should not be used for any illegal services under any circumstances.

# **Processing of Special Categories of Data**

Legally, data related to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dress, membership in an association, foundation, or union, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data are considered special categories of personal data. The company also takes appropriate measures

regarding the use of special categories of personal data as decided by the board of directors. The company can process sensitive information only with the consent of the individuals and only for the purpose for which it was collected.

## **Data Processed by Automated Systems**

Nevodis Kimya San.ve Tic.Ltd.Şti. acts in compliance with the law regarding data processed through automated systems. Information derived from these data cannot be used against an individual without their explicit consent. However, Nevodis Kimya San.ve Tic.Ltd.Şti. can make decisions about the individuals it interacts with based on the information in its system.

#### **COOKIE POLICY**

Like many websites, Nevodis Kimya San.ve Tic.Ltd.Şti. uses cookies and similar technologies to improve the visit experience of website users and to enhance service quality. The company has prepared the Cookie Policy to inform website users about cookies and the types of cookies used, and to guide how cookie preferences can be managed.

If you do not consent to the use of cookies, we kindly ask you not to continue using the website or to change your cookie preferences as indicated in this Policy. We would like to remind you that if cookies are not allowed, some features of the website may lose their functionality.

#### VII. Privacy Principle

## **VIII. Transaction Security**

Nevodis Kimya San.ve Tic.Ltd.Şti. takes all necessary technical and administrative measures to prevent personal data collected from falling into the wrong hands and to prevent any harm to you. This includes ensuring the compatibility of software with standards, careful selection of third parties, and compliance with the company's data protection policy. Security measures are continuously updated and improved.

## IX. Audit

Nevodis Kimya San.ve Tic.Ltd.Şti. conducts the necessary internal and external audits for the protection of personal data.

#### X. Notification of Violations

Nevodis Kimya San.ve Tic.Ltd.Şti. acts immediately to remedy any reported violation related to personal data. It minimizes the damage to the involved party and compensates for the damage. If personal data is obtained by unauthorized external parties, the situation is immediately reported to the Personal Data Protection Board.