

Confidentiality Agreement and Security of Personal Data

Confidentiality Agreement

1) OBJECTIVE AND SCOPE OF THE POLICY

This Confidentiality and Personal Data Protection Policy (“POLICY”) aims to clarify the person groups regarding the processing of the data belonging to the candidates who made job application to Covtex Feizy ("Data Controller"), also belonging to the suppliers, online and physical visitors, users, customers, shareholders, partners and developers (“Person Groups”).

2) PRINCIPLES ON THE PROCESSING OF PERSONAL DATA

2.1) Processing in Conformity With the Law and Good Faith

While processing the personal data, the principles introduced by legal regulations and general trust and honesty rules are abided by.

2.2) Keeping Personal Data Accurate and Updated When Required

In order to ensure that the personal data of the person groups are accurate and up-to-date, periodical checks and updates are carried out and necessary measures are taken in this direction. Within this framework, systems towards checking on the accuracy of personal data and making necessary corrections are created within Covtex Feizy.

2.3) Processing for Precise, Clear and Lawful Objectives

Personal data is processed based on clear, precise and lawful data processing objectives. The objectives for which the data was processed are detailed below.

2.4) Being Relevant, Limited and Moderate as per the Objective of Processing

Personal data is processed in a moderate, relevant and limited manner in order to achieve the contemplated objective(s), and the processing of personal data that is not relevant or not necessary to achieve the objective is avoided.

2.5) Storing for the Time Required by the Relevant Legislation or for the Objective for Which it is Processed

Covtex Feizy stores personal data only for the time required by the relevant legislation or for the objective for which it was processed. Within this scope, at first, it is determined whether the relevant legislation provides for a period for storing personal data. If a period of time is specified, it is treated accordingly. If there is no specified-time period, personal data is stored for the time required for the objective for which it was processed. In case the termination of the period or disappearing of the reasons for processing, and if there is no legal ground enabling them to be processed for a longer period of time, personal data is deleted, wiped out or anonymized pursuant to the Policy of Covtex Feizy on Personal Data Storage and Destruction.

3) CONDITIONS FOR PROCESSING PERSONAL DATA OF PERSON GROUPS

The explicit consent of the relevant person groups is only one of the reasons for compliance with law, which makes it possible to process personal data as per the law. Apart from explicit consent, personal data may also be processed if there exists one of the following reasons for compliance with the law.

The person groups are entitled to obtain information from the relevant persons such as what kind of personal data is processed through this POLICY, for what objectives and for which reasons the personal data is processed, from which sources the personal data is collected, with whom this personal data will be shared and utilized.

3.1) Above-Mentioned Compliance With Law As The Basis of Personal Data Processing

While processing the personal data, the principles introduced by legal regulations and general trust and honesty rules are abided by.

3.2) Being Clearly Contemplated in Laws

Where the processing of personal data is contemplated explicitly in law, Covtex Feizy processes the personal data of the person groups to be processed without further consent.

3.3) Failure to Obtain Explicit Consent of the Respective Person due to Actual Impossibility

Where the processing of personal data is contemplated explicitly in law, Covtex Feizy processes the personal data of the person groups to be processed without further consent.

3.4) Being Clearly Contemplated in Laws

In case that it is necessary to process the personal data of the person group who are unable to express their consent due to the actual impossibility or whose consent cannot be considered as valid, or in order to protect her/his own life or physical integrity of another person, the data of the person groups may be processed without explicit consent.

3.5) Being Directly Related to the Drawing up or Performance of the Agreement

Provided that being directly related to drawing up or to the performance of an agreement, the data may be processed in case it is necessary to process the personal data of the contracting parties. For instance, the personal data shared by the User in order to conduct the membership procedures for Covtex Feizy.

3.6) Fulfillment of Legal Obligations by Covtex Feizy

Where it is necessary to process the personal data in order to fulfill the legal obligations as a data controller, the personal data of the person groups may be processed without explicit consent.

3.7) In Case that Person Groups Makes their Personal Data Known

If the personal data of the person group have been made known by itself, the data may be processed without explicit consent. For instance, personal data that the Member has publicly shared through the Internet and via in social media accounts may be processed if and only to the extent that such sharing is in conformity with her/his intend and at intended-level.

3.8) In Case that Data Processing is Necessary to Establish or Protect a Right

In case that it is necessary to process data for the establishment, use or protection of a right, the data may be processed without the explicit consent of the person group. For instance, in case the information regarding the User is added in his/her court file based on a complaint filed with the relevant court by the User.

3.9) Processing of Data Based on Legitimate Interest

In case that it is necessary to process data for the legitimate interests of Covtex Feizy, personal data may be processed without the explicit consent of the person group only if fundamental rights and freedoms of the person groups are not harmed. For instance, performing satisfaction questionnaires by Covtex Feizy in order to ensure customer satisfaction.

4) CONDITIONS WHERE THE SPECIAL QUALITY PERSONAL DATA CAN BE PROCESSED

Some of the personal data is identified as “special quality personal data” separately and is subject to special protection.

4.1) Processing of Special Quality Personal Data Based on Explicit Consent

In case that the person group has granted its explicit consent, special quality personal data may be processed by taking principles specified in this POLICY and necessary administrative and technical measures.

4.2) Conditions where Special Quality Personal Data may be Processed Without Explicit Consent

In case that where the people group has not grant edits explicit consent, special quality personal data may be processed in the following conditions provided that proper measures are taken by the Personal Data Protection Board (“Board”):

-In cases contemplated by law, special quality personal data other than the health and sexual life of person group,

-Special quality personal data relating to the health and sexual life of the person group, only by persons or authorized institutions or organizations under the obligation of keeping secrets for the purpose of protection of public health, conducting preventive medicine, medical diagnosis, nursing and treatment services and planning health services and obtaining finance for them.

5) CLARIFYING AND INFORMING THE PERSON GROUP

While collecting the personal data, the person group is informed by Covtex Feizy. Within this scope, information including the identity of the contact person of Covtex Feizy, the purpose

for which personal data will be processed, to whom and for what purpose the personal data can be transferred, the method of collecting personal data and legal rights and the rights of the person groups are given to them. In case that the person groups demand information about their personal data, Covtex Feizy shall provide the necessary information through [at] Covtex Feizy. Users who visit Covtex Feizy's website are notified by this Policy, and users who are members of this Policy are also notified by both this Policy and the Membership page.

DATA REQUEST INFORMATION AND DATA CONTROLLERS

Mail for Request:

s.bagci@covtex-feizy.com

COVTEX FEİZY Contact Person 1:

SITKI BAĞCI

s.bagci@covtex-feizy.com

COVTEX FEİZY Contact Person2:

SEDA KÖK

seda@covtex-feizy.com

6) CATEGORIZATION OF PERSONAL DATA

Within the framework of this POLICY, Covtex Feizy processes the personal data of the person groups under the following categories:

User Information

Contact information

Location Data

Physical Space Safety Information

Financial Information

Personal Information

Candidate Employee Information

Person Group Transaction Information

Legal Procedures and Risk Information

Special Quality Personal Data

Complaint Management Information

Content Processing Information

Content Related Information

7) OBJECTIVES OF PROCESSING PERSONAL DATA

7.1) Processing Conditions

Personal data is processed in a limited way under the following conditions. These conditions are;

- In case that relevant activity regarding the processing of your personal data is clearly contemplated in the law,

- In case that being processed of your personal data by Covtex Feizy is directly relevant and necessary for the establishment or performance of an agreement,

- In case that processing of personal data is necessary for Covtex Feizy in order to fulfill its legal obligation,

-Provided that personal data are made known by the people group; in case that being processed by Covtex Feizy for the purpose of making it known in limited way,

- In case that the being processed of personal data by Covtex Feizy is necessary for the establishment, use or protection of the rights of Covtex Feizy or person groups or third parties,

-Without prejudice to the fundamental rights and freedoms of person groups, in case that Covtex Feizy should perform personal data processing for the legitimate interests of itself,

-In case that being processed of personal data by Covtex Feizy is necessary for the protection of the life or physical integrity of the person concerned or someone else, and in this case, the person is unable to express his consent because of actual impossibility or legal invalidity.

If and to the extent of the absence of the above-mentioned conditions; Covtex Feizy asks for the explicit consent of the personal data owners to perform personal data processing.

7.2) Processing Tools

Covtex Feizy processes personal data for the following objectives:

For 3rd Party Person Group who are the Claimant:

Ensuring conformity with legal, regulatory and company management obligations and the good practice.

For public official and administrative institution employee representing the authority which conducts investigation or judgment:

Procurement of information and documents that may be necessary in the management of legal and administrative processes. Fulfillment of legal obligations.

For Online Visitors:

Requirement of compliance with legal regulations.

Logging system movements of online visitors and users

For Shareholder/Partner:

Procurement of information and documents that may be necessary in the management of legal and administrative processes.

8) OBJECTIVES OF PROCESSING PERSONAL DATA

Personal data and special quality personal data belonging to the person group can be transferred to third parties (third party companies, third real persons) by taking necessary security measures in line with the processing objectives.

8.1) Transferring Personal Data

Personal data may be transferred to third parties if the conditions contemplated in Articles 8 and 9 of the PDPL (the Law on Personal Data Protection) are realized. E-mail and/or telephone numbers of the members can be shared with third parties abroad for performing singularisation and matching. Anonymous information of online visitors who are not members of the site and site usage habits can be obtained and shared in line with the principles.

8.2) Third Parties to whom Personal Data is Transferred and Objectives of the Transfer

Your personal data can be transferred to the following data subject people groups:

To Covtex Feizy's

business partners,
developers (Related Developers),
participations,
shareholders,
Legally authorized public institutions and organizations,
Legally authorized private persons.

The scope of the above-mentioned persons to whom the personal data transferred and the objectives of data transfer are given below.

9) SECURITY OF PERSONAL DATA

For the sake of ensuring the security of personal data, reasonable precautions are taken in order to prevent risks of unauthorized access, data loss by accident, deliberate deletion of data or damage to the data. All kinds of technical and physical precautions are taken in order to prevent access to personal data by anyone other than authorized persons. Within this scope, particularly, the authorization system is designed in such a way that no one will be able to access more personal data than necessary. Stringent measures are taken compared to other personal data whilst securing personal data such as health data.

Authorized persons are subject to necessary security checks.

Access records to personal data are kept within the boundaries of technical possibilities and these records are checked at regular intervals. In case of unauthorized access, an investigation is triggered as soon as possible. Moreover, these people are trained about their duties and responsibilities.

Covtex Feizy abides by the following obligations in order to ensure the security of processed data:

Acting in accordance with the law and honestly in matters related to the protection of personal data,

Accurate, wholly and complete processing of personal data,

Performing the necessary works in order to update the outdated personal data,

Informing the manager concerned in case of any violation of the law in the processing of personal data,

Providing the necessary guidance for the execution of legal rights regarding personal data.

10) LEGAL RIGHTS OF PEOPLE GROUPS AND METHODS OF USE THEM

10.1) The Rights Regarding Personal Data within the Scope of PDPL

The rights that may be exercised by person groups concerning personal data are mentioned in Article 11 of the PDPL and are as follows:

- To get information if personal data is being processed,
- To get information about the objective of processing personal data and whether they are used properly,
- To request information in case that personal data has been processed,
- To know the third parties to whom personal data is transferred at home or abroad,
- To request correction of personal data in case of incomplete or inaccurate processing,
- To request deletion or destruction of personal data as per the provisions of the relevant legislation,
- To request announcement of the transactions performed pursuant to the clauses of (d) and (e) to the parties to whom the personal data have been transmitted,
- To raise objection to the occurrence of a result against the person herself/himself by means of analyzing the processed data through automated systems exclusively,
- In case of suffering a loss due to unlawful processing of personal data, to request for compensation for these damages.

10.2) Principles Regarding Exercise of the Rights on Personal Data

In order to exercise the rights concerning personal data, Covtex Feizy users will be able to apply through e-mail to kisilverilerims.bagci@covtex-feizy.com via the e-mail addresses that they register to the system at enrollment.

11) ENFORCEMENT AND BEING UPDATEBLE

This POLICY has taken effect on the date of release. The POLICY will be updated in order to comply with changing conditions and legislation.

ANNEX-1 DEFINITIONS IN THE POLICY

Explicit Consent: Consent based on being informed regarding a specific subject and declared with free will.

Anonymization: Making personal data unable to be associated with any identified or identifiable real person in any way, even by matching it with other data.

Owner of Personal Data: The real person whose personal data is processed. For instance; Users, Developers...

Personal Data: Any information relating to an identified or identifiable real person.

Special Quality Personal Data: Data regarding race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data are special quality data.

Protection of Personal Data: All kind of transaction performed on the data such as collection, recording, storing, keeping, modification, reorganization, disclosure, transfer, takeover, making obtainable, preventing against classification or use, through whether fully or partially automated means or, on the condition being as part of any data recording system, through no automated means.

Data Processor: A real and legal person who processes personal data by the power of the data controller on behalf of his authority.

Data Controller: The real and legal person who determines the objectives and ways of personal data processing and who is responsible for the establishment and management of the data recording system.