

KONYA KAĞIT SAN. VE TİC. A.Ş

PROTECTION AND PROCESSING OF PERSONAL DATA POLICY

**Target Audience:** All real persons whose personal data are processed by Konya Kağıt San ve Tic. A.Ş

**Prepared by:** Konya Kağıt San. ve Tic. A.Ş. Personal Data Protection Committee

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**Approved by:** Konya Kağıt San. ve Tic. A.Ş.

## TABLE OF CONTENTS

1. INTRODUCTION	3
1.1. Objective	3
1.2. Scope	3
1.3. Basis	3
1.4. Definitions	4
2. PERSONAL DATA PROTECTION ISSUES	5
2.1. Ensuring the Security of Personal Data	5
2.2. Protection of Special Categories of Personal Data	5
2.3. Raising Awareness on Protection and Processing of Personal Data	6
3. PROCESSING OF PERSONAL DATA	6
3.1. Processing of Personal Data in Compliance with the Legislation	6
3.2. Conditions for Processing Personal Data	6
3.3. Processing of Special Categories of Personal Data	7
3.4. Informing the Personal Data Owner	7
3.5. Transfer of Personal Data	7
4. PERSONAL DATA INVENTORY PARAMETERS	8
5. MEASURES TAKEN FOR THE PROTECTION OF PERSONAL DATA	9
6. STORAGE AND DESTRUCTION OF PERSONAL DATA	9
7. RIGHTS OF PERSONAL DATA OWNERS AND EXERCISE OF THESE RIGHTS	9
7.1. Rights of the Personal Data Owner	9
7.2. Exercise of Rights by the Personal Data Owner	10
7.3. Responding to Applications	10
7.4. Rejection of the Personal Data Owner's Application	10
7.5. Personal Data Owner's Right to File a Complaint to the PDP Board	10
8. EXECUTION	11
9. EFFECTIVENESS and ANNOUNCEMENT	11
Annex 1- Data Categories and Personal Data	12
Annex 2- Categorical Personal Data Processing Purposes	14
Annex 3 -Persons to whom Personal Data are Transferred and Purposes of Transfer	15

**KONYA KAĞIT SAN. VE TİC. A.Ş.**  
**PERSONAL DATA PROTECTION AND PROCESSING POLICY**

## **1. INTRODUCTION**

Konya Kağıt San. ve Tic. A.Ş. ("**Konya Kağıt**") Konya Kağıt San. ve Tic. A.Ş. has a 31-year history in the sector, accumulation of knowledge, commitment to ethical values, respectful approach to human and animal rights, high environmental awareness, continuously educates itself and renews itself according to the conditions of the day, has a high level of technological know-how, can feel and think together with its strong staff, sees the publishing houses and printing houses it works with as business partners and creates value increase by producing special products for them.

Konya Kağıt attaches importance to the protection of personal data in its activities and considers it among its priorities in its business and transactions. Konya Kağıt Personal Data Protection and Processing Policy ("**Policy**") is the basic regulation for the compliance of Konya Kağıt's organisation and business processes with the personal data processing procedures and principles determined by the Personal Data Protection Law No. 6698 ("**Law**"). In line with the principles of this Policy, Konya Kağıt processes and protects personal data with a high level of responsibility and awareness, and provides the necessary transparency by informing personal data owners.

### *1.1. Objective*

The purpose of this Policy is to ensure that the procedures and principles stipulated by the Law and other relevant legislation are harmonised with Konya Kağıt's organisation and processes and implemented effectively in its activities. Konya Kağıt takes all kinds of administrative and technical measures for the processing and protection of personal data in accordance with this Policy, establishes necessary internal procedures, raises awareness and provides all necessary training to ensure awareness. All necessary measures are taken and appropriate and effective audit mechanisms are established for the compliance of shareholders, authorities, employees and business partners with the Law processes.

### *1.2. Scope*

The Policy covers all personal data obtained by automatic means in Konya Kağıt business processes or by non-automatic means provided that they are part of any data recording system

### *1.3. Basis*

The Policy is based on the Law and relevant legislation. Personal data, Industrial Registry Law No. 6948, Law No. 4703 on the Preparation and Implementation of Technical Legislation on Products, Law No. 132 on the Establishment of the Turkish Standards Institute (TSE) and Laws amending this Law, Law No. 6502 on Consumer Protection, Law No. 1774 on Identity Notification, Labour Law No. 4857, 6331 Occupational Health and Safety Law, Law No. 5510 on Social Security and General Health Insurance, Road Transport Law No. 4925, Export Regulation, Regulation on Organisation of Transport Works, Unemployment Insurance Law No. 4447, Turkish Commercial Code No. 6102, Tax Procedure Law No. 213 and other relevant legislation.

In cases of incompatibility between the legislation in force and the Policy, the legislation in force is applied. Regulations stipulated by the relevant legislation are transformed into Konya Kağıt practices with the Policy.

#### 1.4 . Definitions

<b>Explicit consent</b>	It refers to the consent on a specific subject, based on information and expressed with free will.
<b>Application Form</b>	The application form for the applications to be made by the relevant person (Personal Data Owner) to the data controller, prepared in accordance with the Law No. 6698 on the Protection of Personal Data and the Communiqué on the Procedures and Principles of Application to the Data Controller issued by the Personal Data Protection Authority, which includes the application to be made by personal data owners to exercise their rights.
<b>Related user</b>	Technical storage and protection of data and persons who process personal data within the organisation of the data controller or in accordance with the authorisation and instruction received from the data controller, except for the person or unit responsible for backing up personal data.
<b>Destruction</b>	Deletion, destruction or anonymisation of personal data.
<b>Recording media</b>	Any medium containing personal data that is fully or partially automated or processed by non-automated means, provided that it is part of any data recording system.
<b>Personal data</b>	Any information relating to an identified or identifiable natural person.
<b>Processing of personal data</b>	Any operation performed on personal data such as collection, recording, storage, retention, alteration, re-organisation, disclosure, transfer, acquisition, making available, classification or prevention of use of personal data by fully or partially automatic means or by non-automatic means provided that it is part of any data recording system.
<b>Anonymisation of personal data</b>	Personal data, even by matching with other data, can in no way be associated with an identified or identifiable natural person to make it unattributable.
<b>Personal data subject</b>	The natural person whose personal data is processed by or on behalf of Konya Kağıt.
<b>Deletion of personal data</b>	Deletion of personal data; making personal data inaccessible and non-reusable in any way for the Relevant Users.
<b>Destruction of personal data</b>	The process of making personal data inaccessible, irretrievable and non-reusable by anyone in any way
<b>Board</b>	Personal Data Protection Board
<b>Institution</b>	Personal Data Protection Authority

<b>Sensitive personal data</b>	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data.
<b>Periodic destruction</b>	In the event that all of the conditions for processing personal data specified in the Law disappear, the deletion, destruction or anonymisation process to be carried out ex officio at recurring intervals specified in the personal data storage and destruction policy.
<b>Data Processor</b>	A natural or legal person who processes personal data on behalf of the data controller based on the authorisation granted by the data controller.
<b>Data Recording System</b>	Recording system in which personal data are structured and processed according to certain criteria.
<b>Data subject / Relevant person</b>	The real person whose personal data is processed.
<b>Data Controller</b>	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 recording system.
<b>Data Representative</b>	A natural person appointed to fulfil the duties of the Data Controller within the scope of the relevant articles of law in accordance with the Law.
<b>Regulation</b>	Regulation on Deletion, Destruction or Anonymisation of Personal Data published in the Official Gazette on 28 October 2017.

## **2. PERSONAL DATA PROTECTION ISSUES**

### ***2.1. Ensuring the Security of Personal Data***

Konya Kağıt takes the necessary measures stipulated in Article 12 of the Law, depending on the nature of the personal data, to prevent unlawful disclosure, access, transfer or other security problems that may arise in other ways. Konya Kağıt takes measures and carries out audits to ensure the necessary level of personal data security in accordance with the guidelines published by the

### ***2.2. Protection of Special Categories of Personal Data***

Measures taken for the protection of data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions, security measures and biometric and genetic data of individuals, which are of private nature, are carefully implemented and necessary audits are carried out.

### **2.3. Raising Awareness on Protection and Processing of Personal Data**

Konya Kağıt provides the necessary trainings to those concerned in order to ensure that personal data is processed and accessed in accordance with the law, and to raise awareness about the protection of data and the use of rights.

In order to increase employees' awareness of personal data protection, Konya Kağıt establishes the necessary business processes and receives support from consultants if needed. Deficiencies encountered in practice and the results of trainings are evaluated by Konya Kağıt management. New trainings are organised if needed depending on these evaluations and changes in the relevant legislation.

## **3. PROCESSING OF PERSONAL DATA**

### **3.1. Processing of Personal Data in accordance with the Legislation**

Personal data are processed in accordance with the legislation in line with the principles listed below.

- i. Processing in accordance with the Law and Good Faith**  
Personal data are processed to the extent required by business processes, limited to these, without harming the fundamental rights and freedoms of individuals, in accordance with the law and the rule of honesty.
- ii. Ensuring that Personal Data is Up-to-date and Accurate**  
Necessary measures are taken to keep the processed personal data up to date and accurate and work in a planned and programmed manner.
- iii. Processing for Specific, Explicit and Legitimate Purposes**  
Personal data are processed depending on the legitimate purposes determined and explained in the business processes carried out.
- iv. Being relevant, limited and proportionate to the purpose for which they are processed**  
Personal data are collected to the extent and quality required by the business processes, and processed in a limited manner depending on the specified purposes.
- v. Preservation for the Required Period**  
Personal data are retained for the minimum period stipulated in the relevant legislation and required for the purpose of processing personal data. Firstly, if a period of time is stipulated in the relevant legislation for the storage of personal data, it is kept for this period, and if not, personal data are kept for the period required for the purpose for which they are processed. At the end of the retention periods, personal data are destroyed by appropriate methods (deletion, destruction or anonymisation) in accordance with periodic destruction periods or data subject application.

### **3.2. Conditions for Processing Personal Data**

Personal data is processed based on the explicit consent of the owner or on one or more other conditions specified below.

- i. Explicit Consent of the Personal Data Owner**  
Processing of personal data is carried out with the explicit consent of the data subject. Explicit consent of the personal data owner: It is realised by informing him/her on a specific subject and obtaining his/her free will.
- ii. Absence of Explicit Consent of the Personal Data Owner**  
Personal data may be processed without the explicit consent of the data subject if any of the conditions listed below are present.
  - a. Explicitly Regulated in the Laws**  
In the event that there is a clear regulation on the processing of personal data in the laws, personal data may be processed without the consent of the data subject.

***b. Failure to Obtain the Explicit Consent of the Relevant Person Due to Actual Impossibility***

The personal data of the data subject may be processed if it is mandatory to process the personal data of the person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be recognised as valid, in order to protect his/her or another person's life or physical integrity.

***c. Direct Relevance to the Establishment or Performance of the Contract***

If the processing of personal data is directly related to the conclusion or performance of a contract to which the data subject is a party, the personal data of the data subject may be processed.

***d. Fulfilment of Legal Obligation***

While Konya Kağıt fulfils its legal obligations, personal data of the data subject may be processed if personal data processing is mandatory.

***e. Publicisation of Personal Data by the Personal Data Owner***

Personal data belonging to data subjects who publicise their personal data may be processed limited to the purpose of publicisation.

***f. Mandatory Data Processing for the Establishment or Protection of a Right***

If data processing is mandatory for the establishment, exercise or protection of a right, the personal data of the data subject may be processed.

***g. Mandatory Data Processing for Legitimate Interest***

Provided that it does not harm the fundamental rights and freedoms of the personal data owner, the personal data of the data owner may be processed if data processing is mandatory for the legitimate interests of Konya Kağıt.

***3.3. Processing of Special Categories of Personal Data***

Konya Kağıt processes special categories of personal data in accordance with the principles set out in the Law and the Policy, by taking all necessary administrative and technical measures with the methods determined by the Board, in accordance with the following procedures and principles:

- i. Sensitive personal data other than health and sexual life*** may be processed without seeking the explicit consent of the data subject if there is an explicit provision in the laws regarding the processing. In cases that are not explicitly stipulated in the laws, the explicit consent of the data subject shall be obtained.
- ii. Sensitive personal data relating to health and sexual life*** may be processed by persons under the obligation of confidentiality or by authorised institutions and organisations: for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, without seeking the explicit consent of the data subject. Otherwise, the explicit consent of the data subject shall be obtained

***3.4. Informing the Personal Data Owner***

Konya Kağıt informs personal data subjects about the purposes for which their personal data are processed, with whom they are shared, the methods by which they are collected, the legal grounds and the rights of data subjects in the processing of their personal data in accordance with the relevant legislation. In this respect, the protection of personal data is carried out in accordance with other policy documents and clarification texts prepared within the framework of the principles in the Policy.

***3.5. Transfer of Personal Data***

Konya Kağıt may transfer personal data and sensitive personal data to third parties (third party companies, group companies, third real persons) in accordance with the law by taking necessary security measures in line with the purposes of personal data processing. Konya Kağıt carries out the transfer operations in accordance with the regulations stipulated in Article 8 of the Law.

*i. Transfer of Personal Data*

Although the explicit consent of the personal data owner is required for the transfer of personal data, personal data may be transferred to third parties based on one or more of the following conditions, by taking all necessary security measures, including the methods stipulated by the Board.

- a. It is explicitly stipulated in the laws,
- b. It is directly related to and necessary for the establishment or performance of a contract,
- c. It is mandatory for Konya Kağıt to fulfil its legal obligations,
- d. It is limited to the purpose of publicisation, provided that the personal data has been made public by the data owner,
- e. It is mandatory for the establishment, use or protection of the rights of Konya Kağıt or the data subject or third parties,
- f. It is mandatory for the legitimate interests of Konya Kağıt, provided that it does not harm the fundamental rights and freedoms of the data subject,
- g. It is necessary for the protection of the life or physical integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid.

Personal data related to any of the above-mentioned situations may be transferred to foreign countries that are declared as "**Foreign Country with Adequate Protection**", which is determined to have adequate protection by the Board. Personal data may be transferred to those in the status of "**Foreign Country with a Data Controller Committed to Adequate Protection**", where there is no adequate protection, where the data controllers in Turkey and the foreign country undertake an adequate protection in writing and where the Board has permission, according to the conditions stipulated in the legislation.

*ii. Transfer of Special Categories of Personal Data*

Sensitive personal data may be transferred under the conditions set out below by taking all necessary administrative and technical measures, **including the methods to be determined by the Board, in accordance with the principles set out in the Policy:**

- a. Sensitive personal data other than health and sexual life, in the event that there is an explicit provision in the laws regarding the processing of personal data, without seeking the explicit consent of the data subject, otherwise, in the event that the explicit consent of the data subject is obtained.
- b. Sensitive personal data relating to health and sexual life, for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, by persons or authorised institutions and organisations under the obligation of confidentiality, without seeking explicit consent, otherwise, in case of obtaining the explicit consent of the data subject.

Personal data may be transferred to those in the status of "**Foreign Country with Adequate Protection**" in the presence of any of the above conditions, and in the absence of adequate protection, personal data may be transferred to those in the status of "**Foreign Country where the Data Controller Undertakes Adequate Protection**" according to the data transfer conditions regulated in the legislation.

**4. PERSONAL DATA INVENTORY PARAMETERS**

Konya Kağıt; management, administrative affairs, human resources, purchasing, data processing, accounting-finance, sales and marketing, production, quality control, technical affairs, dispatch-warehouses and maintenance business processes; Data categories and personal data (**Annex-1**) of personal data owners consisting of employee candidates, employees, shareholders/partners,



potential product or service buyers, interns, supplier employees, supplier officials, product or service recipients, parents/guardians/representatives, visitors, family members and relatives are processed depending on the purposes of personal data processing (**Annex-2**). The purposes of processing according to the data categories and the details of the data subject groups are notified in the field of Konya Kağıt at <https://verbis.kvkk.gov.tr/>.

Personal data processing purposes are processed according to the personal data categories, in accordance with the purposes determined to inform the relevant persons in accordance with Article 10 of the Law and other legislation, based on and limited to at least one of the personal data processing conditions specified in Articles 5 and 6 of the Law, in accordance with the general principles specified in the Law, especially the principles specified in Article 4 of the Law regarding the processing of personal data.

Personal data are transferred in accordance with the principles specified in the section "3.5: Natural persons or private legal entities, shareholders, subsidiaries and affiliates, suppliers, authorised public institutions and organisations, private insurance companies, contracted service providers and collaborating organisations (**Annex-3**). There is no data transfer to foreign countries.

## **5. MEASURES TAKEN FOR THE PROTECTION OF PERSONAL DATA**

Konya Kağıt takes the necessary technical and administrative measures for the protection of personal data that it processes in accordance with the procedures and principles set out in the Law, conducts the necessary audits in this context, and carries out awareness-raising and training activities.

In the event that the processed personal data is illegally obtained by third parties despite all technical and administrative measures have been taken, Konya Kağıt notifies the relevant persons and units as soon as possible.

## **6. STORAGE AND DESTRUCTION OF PERSONAL DATA**

Konya Kağıt retains personal data for the period required for the purpose of processing and for the minimum period stipulated in the relevant legislation. If a period of time is stipulated in the relevant legislation, Konya Kağıt stores personal data in accordance with this period; if no legal period is stipulated, Konya Kağıt stores personal data for the period required for the purpose of processing personal data. Personal data are destroyed at the end of the specified retention periods, in accordance with the periodic destruction periods or the data owner's application, by the specified method (deletion, destruction or anonymisation).

## **7. RIGHTS OF PERSONAL DATA OWNERS AND EXERCISE OF THESE RIGHTS**

### ***7.1. Rights of the Personal Data Owner***

Personal data owners have the following rights arising from the Law:

- i. To learn whether personal data is being processed,
- ii. Requesting information if personal data has been processed,
- iii. To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- iv. To know the third parties to whom personal data are transferred domestically or abroad,
- v. 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 is transferred,
- vi. Although it has been processed in accordance with the provisions of the Law and other relevant laws, to request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,

- vii. To object to the emergence of a result to the detriment of the person himself/herself by analysing the processed data exclusively through automated systems,
- viii. In case of damage due to unlawful processing of personal data, to demand compensation for the damage.

### **7.2. Exercising the Rights of the Personal Data Owner**

Personal data owners may submit their requests regarding the rights listed in Article 6.1. to Konya Kağıt by the methods determined by the Board. Personal data owners and those who have the right to apply on their behalf may apply to Konya Kağıt by filling out the "Personal Data Owner Application Form" (Annex-4).

### **7.3. Konya Kağıt's Response to Applications**

Konya Kağıt finalises the applications made by the personal data owner in accordance with the Law and other legislation. Requests duly submitted to Konya Kağıt shall be finalised free of charge as soon as possible and within 30 (thirty) days at the latest. However, if the transaction requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board.

### **7.4. Rejection of the Personal Data Owner's Application**

Konya Kağıt may reject the applicant's request by explaining its reasoning in the following cases:

- i. Processing of personal data for purposes such as research, planning and statistics by anonymising them with official statistics,
- ii. 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 defence, national security, public security, public order, economic security, privacy of private life or personal rights or constitute a crime,
- iii. Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organisations entrusted and authorised by law to ensure national defence, national security, public safety, public order or economic security,
- iv. Processing of personal data by judicial or enforcement authorities in relation to investigation, prosecution, judgement or execution proceedings,
- v. Processing of personal data is necessary for the prevention of crime or criminal investigation,
- vi. Processing of personal data made public by the personal data subject himself/herself,
- vii. Processing of personal data is necessary for the execution of supervisory or regulatory duties and disciplinary investigation or prosecution by the public institutions and organisations and professional organisations in the nature of public institutions, which are authorized by the law,
- viii. Processing of personal data is necessary for the protection of the economic and financial interests of the State in relation to budgetary, tax and financial matters,
- ix. The possibility that the request of the personal data owner may prevent the rights and freedoms of other persons,
- x. Requests that require disproportionate effort have been made,
- xi. The requested information is publicly available.

### **7.5. Personal Data Owner's Right to File a Complaint to the PDP Board**

Pursuant to Article 14 of the Law, in cases where the application is rejected, the response is deemed inadequate or the application is not responded to in due time, the applicant may file a complaint to the Board within thirty days from the date of learning the response of Konya Kağıt and in any case within sixty days from the date of application.

### **7.6. Information that may be requested from the applicant Personal Data Subject**

Konya Kağıt may request information from the applicant to determine whether the applicant is the owner of personal data. Konya Kağıt may ask the personal data subject questions about his/her application in order to clarify the matters contained in the personal data subject's application.

## **8. EXECUTION**

The Policy has been approved and put into effect by the Board of Directors. The technical execution of the Policy is provided by the "**Personal Data Storage and Destruction Policy**" (Annex-5).

In business processes, the execution of the Policy before the parties is ensured by the "**Customer Clarification Text and Explicit Consent Declaration**" (Annex-6), "**Corporate Confidentiality Undertaking**" (Annex-7), "**Supplier Clarification Text and Explicit Consent Declaration**" (Annex-8), "**Employee Clarification and Explicit Consent Declaration**" (Annex-9), "**Employee Confidentiality Agreement**" (Annex-10), "**Employee Candidate Clarification Text and Explicit Consent Declaration**" (Annex-11), "**Website Cookie Clarification Text**" (Annex-12), "**Camera Recording Systems Clarification Text**" (Annex-13) "**Carrier Clarification Text and Explicit Consent Declaration**" (Annex-14).

The Board of Directors is responsible for the execution of the Law and the Policy and updating it when necessary, and Konya Kağıt Personal Data Protection Committee is responsible for the follow-up, coordination and supervision of all works and transactions within this scope.

## **9. EFFECTIVENESS and ANNOUNCEMENT**

The Policy has entered into force as of the date of publication. Amendments to the Policy shall be published on Konya Kağıt's website ([www.konyakagit.com.tr](http://www.konyakagit.com.tr)) and made available to personal data owners and relevant persons. Policy amendments enter into force on the date of announcement.

## **ANNEXES**

**Annex 1- Data Categories and Personal Data**

**Annex 2- Purposes of Processing Personal Data**

**Annex 3- Persons to whom Personal Data are Transferred and Purposes of Transfer**

**Annex 4- Data Subject Application Form**

**Annex 5- Personal Data Storage and Destruction Policy**

**Annex 6- Customer Clarification Text and Explicit Consent Declaration**

**Annex 7-Corporate Confidentiality Undertaking**

**Annex 8- Supplier Clarification Text and Explicit Consent Declaration**

**Annex 9- Employee Clarification Text and Explicit Consent Declaration**

**Annex 10- Employee Candidate Clarification Text and Explicit Consent Declaration**

**Annex 11- Website Cookie Clarification Text**

**Annex 12- Camera Recording Systems Clarification Text**

**Annex 13- Carrier Disclosure Text and Explicit Consent Declaration**

**Annex 14- Employee Confidentiality Agreement**

## ANNEX 1- Data Categories and Personal Data

Data Categories	Personal Data
<b>Identification</b>	Name, Surname
	Mother-Father Name
	Date of Birth
	Place of Birth
	Marital Status
	TR Identity No
	Temporary Turkish ID Number
	Gender Information
	Turkish Republic Identity Card
	Driver Licence
	Nationality
<b>Contact</b>	Address
	E Mail Address
	Contact Address
	Registered Electronic Mail Address (KEP)
	Telephone No
<b>Location</b>	Location information, etc.
<b>Personnel</b>	Payroll Information
	Disciplinary Investigation
	Employment Entry-Exit Document Records
	CV Information
	Military Service Information
<b>Legal Action</b>	Information in correspondence with judicial authorities, information in the case file, etc.
<b>Customer Transaction</b>	Invoice
	Deed
	Cheque Information
	Order Information
	Appointment Information
	Request Information
<b>Physical Space Security</b>	Employee Entry-Exit Registration Information
	Visitor Entry and Exit Registration Information
	Security Camera Recordings
<b>Process Security</b>	IP Address Information
	Website Login and Logout Information
	Password and Passcode Information
<b>Risk Management</b>	Information processed for the management of commercial, technical and administrative risks, such as
<b>Finance</b>	Balance Sheet Information
	Financial Performance Information
	Credit and Risk Information
	Bank Account Number
	IBAN Number

<b>Professional Experience</b>	Diploma Information
	Courses Attended
	On-the-Job Training Information
	Certificates
	Transcript Information
	Last Employed Company Information
	Reference
<b>Marketing</b>	Shopping History Information
	Survey
	Cookie Registrations
	Information Obtained through the Campaign
<b>Audio and Visual Recordings</b>	Camera Recordings
	Photo
<b>Association Membership</b>	Association Membership Information
<b>Health Information</b>	Information on Disability Status
	Blood Group Information
	Personal Health Information
	Device and Prosthesis Information
	Laboratory and Imaging Results
	Test Results
	Inspection Data
<b>Criminal Conviction and Security Measures</b>	Information on Criminal Conviction
<b>Family Information</b>	Number of Children
	Spouse Labour Information
	Child Education and Age Information
	Birth and Death Certificate
<b>Working Data</b>	Branch-Department
	Mode of Operation
	Profession
	Occupation Card Information
<b>Signature Information</b>	Wet or electronic signatures, fingerprints, special marks on documents that are personal data
<b>Website Usage Data</b>	Site Login Frequency/Times
	Last Login Date
	IP Address
	Browser Information
<b>Request/Complaint Management Information</b>	Survey Data
	Personal data regarding the receipt and evaluation of any request or complaint addressed to the Company.
<b>Reputation Management Knowledge</b>	Information collected for the purpose of protecting the commercial reputation of the Company and information about the evaluation reports and actions taken.
<b>Event Management Knowledge</b>	Personal data processed in order to take the necessary legal, technical and administrative measures against the events that develop in order to protect the commercial rights and interests of the Company and the rights and interests of its customers.

<b>Insurance</b>	Automatic Participation PPS
	Social Security Institution Data
<b>Vehicle Information</b>	Vehicle Licence Plate Data
<b>Compliance Information</b>	Personal data processed within the scope of compliance with policies
<b>Audit and Inspection Information</b>	Personal data processed during internal or external audit activities
<b>Residence and Work Permit Information for Foreigners</b>	Information on Residence and Work Permits for Foreigners

## ANNEX 2- Categorical Personal Data Processing Purposes

Execution of Emergency Management Processes
Execution of Information Security Processes
Execution of Application Processes of Employee Candidates
Labour Contract and Legislative Obligations for Employees
Fulfilment Execution of Fringe Benefits and Benefits Processes for Employees
Conducting Audit / Ethics Activities
Execution of Training Activities
Execution of Access Authorisations
Execution of Activities in Accordance with the Legislation
Execution of Finance and Accounting Affairs
Execution of Company / Product / Service Loyalty Processes
Ensuring Physical Space Security
Execution of Assignment Processes
Follow-up and Execution of Legal Affairs
Conducting Internal Audit / Investigation / Intelligence Activities
Execution of Communication Activities
Planning Human Resources Processes
Execution / Supervision of Business Activities
Execution of Occupational Health / Safety Activities
Execution of Business Continuity Ensuring Activities
Execution of Logistics Activities
Execution of Goods / Service Procurement Processes
Execution of Goods / Services After Sales Support Services
Execution of Goods / Service Sales Processes
Execution of Goods / Services Production and Operation Processes
Execution of Customer Relationship Management Processes
Execution of Activities for Customer Satisfaction
Organisation and Event Management
Conducting Marketing Analysis Studies
Execution of Performance Evaluation Processes
Execution of Advertising / Campaign / Promotion Processes
Execution of Risk Management Processes
Execution of Storage and Archive Activities
Execution of Contract Processes
Execution of Strategic Planning Activities
Follow-up of Requests / Complaints
Ensuring the Security of Movable Property and Resources
Execution of Supply Chain Management Processes

Execution of Wage Policy
Execution of Marketing Processes of Products / Services
Ensuring the Security of Data Controller Operations
Execution of Investment Processes
Execution of Talent / Career Development Activities Providing Information to Authorised Persons, Institutions and Organisations Execution of Management Activities
Creating and Tracking Visitor Records

### ANNEX 3 - Persons to whom Personal Data are Transferred and Purposes of Transfer

In accordance with Articles 8 and 9 of the Law, Konya Kağıt may transfer personal data of employee candidates, employees, shareholders/partners, potential product or service recipients, interns, supplier employees, supplier officials, product or service recipients, parents/guardians/representatives, visitors, family members and relatives to the following categories of persons:

<b>Persons to whom data can be transferred</b>	<b>Definition</b>	<b>Purpose and Scope of Data Transfer</b>
<b>Natural persons or private law legal entities</b>	Konya Kağıt is in contact with and has transactions with due to its activities	Limited to the work and transaction performed
<b>Legally Authorised Public Institutions and Organisations</b>	natural or legal persons	Limited to the purpose requested by the relevant public institutions and organisations subject to the legal authority
<b>Contracted service providers and collaborating organisations</b>	Social Security Institution, Tax Offices etc. related legislation	Limited to the principles of the contract and cooperation protocol
<b>Group Companies</b>	public institutions and organisations authorised to receive information and documents from Konya Kağıt in accordance with the provisions of	Limited to the work and works performed
<b>Suppliers</b>	Contracted service providers and collaborating organisations	Limited to the procurement of goods and services to fulfil Konya Kağıt's commercial activities from outsourcing
<b>Customers</b>	Group companies with which it has relations due to its activities	Limited to the scope of product and service sales and marketing
<b>Associates and Subsidiaries</b>	Parties providing services to Konya Kağıt in line with their data processing purposes and requests	Limited to the planning, execution and supervision of strategies related to the commercial activities of Konya Kağıt