

**CLARIFICATION FORM REGARDING THE MANAGEMENT OF PERSONAL DATA (WORKER)
IN PURSUANT TO THE LAW NO. 6698 OF THE PROTECTION OF PERSONAL DATA (“PDPL”)**

Article 1 – Identity of the Data Supervisor

1.1 The law No. 6698 titled, “Law on the Protection of Personal Data” (Will be shortened to “Law” hereinafter) came into effect on 07.04.2016. Under the scope of this law, our company INTERPROBE Information Technologies Inc., (Will be shortened to “INTERPROBE” hereinafter) bears the role of “Data Supervisor” and performs the necessary adaptational work to fulfil the responsibilities required by this role. This clarification form includes our explanations on how INTERPROBE processes the personal data held within the Company, types of data processed, causes for processing data, sharing/transferring of the data to institutions and organizations as necessary, the physical or electronic environments in which the data is held and how the data is protected where the data in question is related to it’s employees working under the scope of Law (includes Intern’s) as part of the established bussiness relations, this document will be updated by INTERPROBE if deemed necessary and published in up-to-date form. Under the law, personal data covers all sorts of data related to the person who’s identity has either been identified or is identifiable. A special subtype of personal data defined as Sensitive Personal Data represents race, ethnicity, political opininon, philosophical belief, religion, cult, other beliefs, clothing attire, association, charity or union processing, health, sexual life, penalty conviction and security measures, biometric and genetic data. It defines any sort of action taken on the data such as processing, the attainment of personal data through partial or fully automatic methods or manually as long as it is part of a data logging system, the registry, storage, modification, re-editing, explanation, transfer, takeover, making procurable, classification or the prevention of the usage of data.

Article 2 – The Management of your Personal Data and The Types of Data Processed

2.1. Under the Law No. 6698 of the Protection of Personal Data(“Law”) and provisions seen in related legislations, INTERPROBE will be able to collect and process the following data from the worker,

2.2.

Types of Data Processed	Channels of Attainment	Causes for Processing	Legal Justification
Under the requirements of the work that we do at INTERPROBE we process the following data: - Name, Surname - Nationality - Photo - Copy of Identity Card - Address of Residence - Phone Numbers - Email Addresses - Driver License Data - Educational Status - Previous Job Data - Health Data - Gender - Reference Information - Marital Status - Visual and Audio Recordings Obtained through Closed Circuit Security Camera Systems (CCTV) - Criminal Record - Name, Surname of the worker’s relative - Phone number of the	- The CV provided to the company by the worker - Educational data provided to the company by the worker - Other documents provided to the company by the worker - The application form submitted to the company by the worker - Closed Circuit Monitoring Camera Systems (CCTV)	- For the responsibilities of the workers originating from the business contract and legislations to be fulfilled, for the job applications of the workers to go through and employee engagement policies to proceed, for pricing policies to be processed - For the facilitation of contract processes - For the execution of storage and archiving activities -For the execution of performance evaluation processes - To be able to inform public officials when requests are made in relation to public security matters and due to	- The fulfilment of responsibilities arising from No. 4857 Labor Law - The fulfilment of responsibilities arising from Social Insurance and General Health Insurance Act No. 5510 - The fulfilment of responsibilities arising from Occupational Health and Safety Law No. 6331 - Legitimate Interests

Types of Data Processed	Channels of Attainment	Causes for Processing	Legal Justification
workers relative - Address data of the workers's relative - Nationality of the worker's relative - Signature - Sample of handwriting - Approved marriage record - Log Records - Face Recognition		legislative requirements -For the preparation of all records and documents on the (Internet/Mobile etc...) or in a physical environment -For the execution of job activities -For the execution of job health and security activities -For the execution of emergency management proceedings -For Information Security proceedings -For the facilitation of archiving and storage activities -Assurance of security for the physical environment -Law of Security of the Defence Industry Agency -Defence Industry Agency Security Regulations - Private Institute Security Handbook (PISH)	

Article 3 – To whom and why the processed data may be transferred

3.1. Your personal data may be processed by the data supervisor or legal/real person(s) appointed by the data supervisor under the provided circumstances in line with the PDPL. * No. 4857 Labor Law, No. 6098 Turkish Code of Obligations, No. 6698 Law of the Protection of Personal Data, No. 5510 Social Insurance and General Health Insurance Act and the fulfilment of our judicial responsibilities including our responsibilities as part of other primary and/or secondary legislations, *The fulfilment of all of our responsibilities in judicial proceedings including the business contract that we will sign with you, * Identity verification and record creation, * Processing under any legitimate cause including the assurance of job security and health; preparing all records and documents for the purpose of processing in electronic or paper form, Abiding by the responsibilities foreseen by the legislation, related regulatory agencies and other authorities in the preservation, reporting and notification of information, * The creation, putting forth and defending of legal requests, * Support the professional development of workers, management and evaluation of hiring procedures, planning the evaluation and accounting procedures of workers, the management of the benefits given to the workers, * The analysis of violations and suspected violations of the company's conduct and the Law and taking action towards this end and the supervision of communications made through the equipment provided by the Company and/or communications performed in the scope of work done in relation to the Company, * Control of access to buildings due to security concerns, * Management of the travel and costs of workers, * Undertaking emergency precautions and operations, the establishment of communications in case of accidents, loss and other emergency situations, * Taking action on lawsuit and enforcement files, the

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delivery processes of mails sent through official notices via cargo and carriers to receivers, the notification of SGK, İŞKUR and Law Enforcement, the creation and follow-up of personal documentation files, the preservation of personal documentation files when employment is ceased. * Proceeding with customer relations effectively and actively, assuring customer satisfaction, * The printing of business cards, enabling all sorts of communications within the Company, ensuring that internal sms, e-mail and other announcements can be made, the instatement of mail addresses * The establishment, supervision and protection of information security, the preservation of Internet Logs. * Guarantee that computer programs and applications used in the workplace are utilized according to the specified procedures, supplying motor vehicles, phones, computers and internet passwords as necessiated by the job, the tracking of corporate vehicles due to job proceedings, worker and third person security, administrative and judicial needs. * To proceed with permits, the management of all permit related topics through requests and approvals, * The completion and followup of individual retirement processes, * Enabling entry and exits to the Workplace and it's branches, the production of magnetic cards for entry to the Workplace and it's branches, the procurement of Workplace entry and exit records,* For tracking and watching disease permits or tracking the necessary health conditions to ensure that the Employee can perform their work, * For the purpose of tracking the garnishment of wages placed on the Worker, * For communications to be established with the contacts that the Worker has provided willingly in case of emergency situations, * For the preparation of reports and analytics to be provided to the higher management, * For the fulfilment of software, corporal source planning, marketing.. and similar processes, * For the purpose of saving camera recordings for security and privacy measurements in the Workplace, * For the fulfilment of responsibilities related to e-bills, e-archive and e-waybills, * For the requests of public institutions and organization to be fulfilled as required or necessitated by legal regulations, * For the fulfilment of legal responsibilities stated in the PDPL, * To benefit from promotions and offers, * For emergency medical interventions, * For the quality, data security and privacy policies and standards of INTERPROBE to be attained and supervised properly, * To open a salary account for the Worker, * For several types of Human Rights applications, * For the organization of Company Trips. During the period of your business relations, INTERPROBE will be able to process your processed or yet to be processed personal data in certain intervals according to the causes specified above in order to maintain healthy business relations and this data will be updated through either your or INTERPROBE's inquiry as a measure against the potential for this data to change with time. Your Personal and Sensitive Personal Data as clarified in Article No. 2 of this clarification text may be transferred according to the causes determined in Article No. 3 to Institutions and Organizations as allowed by the Turkish Commercial Code, Tax Procedure Law and other legislative provisions, The Ministry of Finance, The Ministry of Labor and Social Security, The Ministry of Customs and Trade, The Social Security Institution, Information Technologies and Communications Institution, The Ministry of Internal Affairs and judicial authorities due to security investigations of the Authority on the Protection of Personal Data, our Direct/Indirect domestic/foreign shareholders, associated partners and/or subsidiaries, domestic/foreign person(s) and/or organizations that provide us with contractual services in order for us to be able to orchestrate our activities as INTERPROBE. Besides this, if software is obtained from abroad as host services or cloud systems, your personal data can be shared under the scope of transfers emanating from the usage of these services.

Under the condition that your processed personal data lies under the scope of mandatorily required information it may be transferred inland with, * Banks for the purpose of opening salary accounts, * Car rental companies to provide rental cars when required, *GSM operators to provide phone accounts as needed, * Individual retirement companies to fulfil the mandatory individual retirement responsibilities of the company, * With food corporations in the case that a food card is provided, * With insurance companies in the case that health insurance is established, * Work health and security companies, hospitals and health institutions to provide emergency medical interventions and to fulfil work health and security responsibilities, * With providers and solution partners to fulfil processes such as software, corporate source planning, reporting and marketing, * With audit firms and data security firms to ensure that the necessary quality, privacy and standards are met, * With cloud informatics firms as necessiated by the IT technologies used by INTERPROBE, * For the fulfilment of our responsibilities in pursuant to the applicable law and with auditing firms, private integrator firms, independent auditing firms, customs firms, financial consultation/accounting firms, law offices, * To business partners and suppliers to provide promotions and gifts, * Tourism and/or transportation firms and relevant suppliers for the purpose of reservation/promotion, * With relevant suppliers and business partners for the operability and security of ERP etc. other information technology systems, * With cargo firms to enable delivery when required, * With institutions and companies requesting references regarding the Worker, * With public institutes and organizations for the execution of legal requirements and/or the fulfillment of requests made by official authorities, if these transfers necessiate direct consent by Law, they will be done by obtaining a direct consent (excludes situations where legally obtaining direct consent is not necessary) and will be done under the conditions specified under the scope of the Law.

The processed personal data may be shared with transportation companies and relevant suppliers abroad provided that it is restricted to mandatorily required data.

Article 4 – Methods of Collecting Personal Data and Legal Justification

4.1. Personal data can be obtained through the 24/7 camera systems if legal relations are established. PDPL clarification visual posters are located in Workplace divisions that include camera systems. A link exists in the context of the visual that leads to this clarification text.

4.2. In pursuant to the provision located in article No. 5 of the PDPL, personal data cannot be processed without the direct consent of the relevant person. The law has clarified special circumstances where direct consent will not be sought. Your personal data may be processed without seeking direct consent in the case that an explicit provision is present in the Law, as long as it is directly related to the enactment or completion of a contract, that it is necessary for the personal data of contracting parties to be processed, that it is mandatory for the fulfilment of the company's judicial responsibilities, that it is made public by the person in question themselves, that it is necessary to process data for the establishment, utilization or protection of a right and under the condition that the fundamental rights and freedoms of the relevant person are not damaged.

4.3. For INTERPROBE to be able to proceed with its operations, personal data may be processed on the basis and procedures foreseen in the other related legislations and with regard to the causes and conditions for processing personal data as stated in articles 5. and 6. of the PDPL in order to fulfil the causes specified in this clarification text and for the fulfilment of the judicial responsibilities specified above.

Article 5 – The Storage Period and the Privacy of your Personal Data

5.1. Your personal data will be stored according to the causes specified above as long as your contract of employment remains active. Personal data which has to be stored mandatorily by Law will be stored for 15 (fifteen) years upon the termination of your contract of employment in pursuant to the social security legislation.

5.2. For the precautions required under the scope of Private Institute Security Handbook and again for the securization of the inner company, visual and audio recordings attained through camera's with audio recording functionality inside or outside of the company will be kept for 3 (three) months.

5.3. You can withdraw the permission that you have provided for the processing of your personal data at any time excluding personal data that has to be processed mandatorily by law.

5.4. In line with the provisions of the PDPL, your personal data which has been processed through the causes stated in this "Clarification Text Regarding the Processing of Personal Data", will be deleted, destroyed or will be used in anonymity according to the Retention and Destruction Policy when the time frame that we have determined as mandatory in pursuant to the legislation is met or when the cause for its processing according to article No. 7/f.1 of the PDPL no longer exist.

5.5. INTERPROBE is responsible for taking all sorts of necessary judicial, technical and executive precautions in ensuring an appropriate level of security in order to prevent the unlawful processing and access to personal data and to ensure that the data is guarded.

5.6. It is important for your personal information to be correct and up-to-date. In the case that any information is incorrect or outdated you bear the responsibility of immediately contacting the Human Resources Department. The Company will fix, update, delete or remove the data in question.

Article 6 - Your rights over your personal data under the scope of the Law No. 6698

6.1. Know whether any of your personal data has been processed, request information regarding activities in which your data has been processed, know why your personal data is being processed, know the domestic or foreign third parties who have received your data, request for your personal data to be edited if it has been processed inadequately or incorrectly, ask for the data to be deleted or obliterated if the causes for the processing of the data are no longer valid or if the Company does not have a legal basis or legitimate interests to maintain the data, request for the Company to ensure that third parties who were authorized by the Company to process your personal data respect your rights with in line to this section, object to adverse outcomes caused by the processing of personal data through automatic systems and request for any harm caused by the unlawful processing of your personal data to be resolved.

6.2. You can communicate your questions regarding your rights over the processing of your Personal Data to the Human Resources Department.

6.3. Requests made in relation to your personal data will be answered through the instrument of your inquiry after a maximum period of 30 days after it reaches us.

Article 7 – Your Responsibilities

7.1. You must ensure that all personal data to which you have access is processed in line with the Law and other legal legislations. This responsibility is shared equally by the Company's workers/worker candidates and the third parties who have their data processed. You must not use the personal data in question for purposes other than the causes created by your service relationship with the Company and the measurements required by these causes. (Know that disregarding this is not only a violation of the Law but also a violation of your Business Contract.)

7.2. In the case that you provide us with the information of a third person (for example; the contact information of someone to be contacted in case of emergency), you are considered to have accepted that the person in question has provided you with direct consent for their data to be processed in scope of the Law, that the necessary clarification was provided to them and that they have accepted the privacy notices in advance.

With regard to the information above;

I have read and understand

Worker

Name/Surname :

Signature :

Date :

APPROVAL FORM REGARDING THE MANAGEMENT OF PERSONAL DATA(WORKER)
IN PURSUANT TO THE LAW NO. 6698 OF THE PROTECTION OF PERSONAL DATA (“PDPL”)

I hereby accept, declare and pledge that I consent to the highlighted articles without any outer influence and permit the collection, management and the transfer of my Personal Data and Sensitive Personal Data throughout the period set by law according to the causes, scope and categories specified in The Clarification Form Regarding the Processing of Personal Data in pursuant to the No. 6698 Law On The Protection of Personal Data, that I have been informed regarding my rights by the above Clarification Text and that the data provided by my side to the Company is correct, complete and truthful and that I will immediately notify INTERPROBE Information Technologies Inc. if any changes take place with this information.

With regard to the information above;

I have read and understand

I accept and undertake

Worker

Name/Surname :

Signature :

Date :

This document of approval has been prepared as an inseparable part of the Worker Clarification Text.