

GÜNAYDINLAR ORGANİK GIDA İNŞAAT TURİZM
OTOMOTİV PETROL İTHALAT İHRACAT SANAYİ VE TİCARET LİMİTED ŞİRKETİ

PERSONAL DATA PROTECTION AND PROCESSING POLICY

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1. PURPOSE AND SCOPE OF THE POLICY

Hereby this Policy on Protection and Processing of Personal Data ("Policy") has been prepared by Günaydınlar Organik in order to inform you about the procedures and principles of processing personal data. The principles regarding the processing of personal data belonging to data owners have been explained by Günaydınlar Organik within the framework of this Policy in accordance with the Law on Protection of Personal Data (LPPD). Descriptions made within the scope of this Policy include Günaydınlar Organik employees, employee candidates, active and potential customers, visitors, and other real persons presently having a business relationship with Günaydınlar Organik.

2. DEFINITIONS

LPPD / LAW: It means the Law on Protection of Personal Data No.6698.

Explicit Consent: It means the consent based on informing a person and freely expressed by that person regarding a specific subject.

Anonymization: Making personal data unable to associate with a certain or identifiable natural person in any way, or even matching it with other data.

Destruction: Deletion, elimination, or anonymization of personal data.

Personal Data: All kinds of information regarding an identified or identifiable natural person.

Processing of Personal Data: It means all kinds of procedures preventing the data from any kind of processing, including being obtained, recorded, stored, preserved, changed, reorganized, disclosed, transferred, taken over, made available, classified, or used through fully or partially automatic means, as well as through non-automatic means which are somewhat a part of a registration system.

Data Processor: Real and legal person who processes personal data on behalf of the data controller based on the authority granted by him.

Data Controller: The person who determines the purposes and means of processing personal data and manages the place where the data is systematically kept. Within the scope of this policy, the data controller is Günaydınlar Organik, operating at the address Cumhuriyet Cad. 96 / E Erbeyli / İncirliova / Aydın.

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3. EXECUTION AND DISTRIBUTION OF THE POLICY

This Policy, which was issued by Günaydınlar Organik, was put into effect on 30.07.2019. This Policy made available to Günaydınlar Organik employees and other third parties by being published on Günaydınlar Organik's website (<http://www.gunaydins.org>) and its intranet.

4. ISSUES ON THE PROTECTION OF PERSONAL DATA

4.1. GENERAL PRINCIPLES ON THE PROCESSING OF PERSONAL DATA

Günaydınlar Organik meets the general principles and conditions set forth in the legislation regarding the protection and processing of personal data and acts in accordance with the provisions listed below in order to ensure that personal data are processed in accordance with the Constitution and LPPD.

• Compliance of Personal Data Processing Activities with Law and Integrity Rules

Günaydınlar Organik carries out personal data processing activities in accordance with the legislation on the protection of personal data and general reliability and integrity rules.

• Ensuring that Personal Data is Accurate and Updated when Required

Günaydınlar Organik fairly processes personal data and ensures that the processed personal data is periodically checked and processed and is up to date.

• Processing of Personal Data for Specific, Clear, and Legitimate Purposes

Günaydınlar Organik collects personal data for legitimate and lawful reasons and processes them within a reasonable framework and to the extent necessary, in relation to their activities.

• Being Sensible, Limited, and Related to the Purpose of Processing

Günaydınlar Organik refrains from processing personal data that are not related or needed for the purpose of processing. In this framework, it is essential to minimize data processing activity.

• Preserving the Data for the Period Stipulated in the Relevant Legislation or Required for the Purpose of Processing

Günaydınlar Organik retains the personal data it processes only for the period stipulated in the relevant legislation and laws or as required by the personal data processing purpose. In this context, first of all, it is determined whether a certain period is stipulated in the relevant legislation for the storage of personal data subject to processing. If a legal period has been determined, this period is followed. If the legal period has not been determined, the time required for the fulfillment of the processing purpose is determined and personal data are stored for this period. If there is no legal reason to keep the data for a longer period, personal data are deleted, destroyed, or anonymized when the period ends.

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4.2. PROCESSING SENSITIVE PERSONAL DATA

Günaydınlar Organik acts sensitively in the protection of personal data of special nature, which are determined as sensitive by LPPD and processed in accordance with the law. In this context, the technical and administrative measures taken by Günaydınlar Organik for the protection of personal data are carefully implemented in terms of sensitive personal data.

4.3. TERMS OF PROCESSING PERSONAL DATA

Apart from the exceptions listed within the scope of LPPD, Günaydınlar Organik processes personal data only upon the explicit consent of the data owners. In accordance with the 2nd paragraph of Article 5 of the LPPD, Günaydınlar Organik may process your personal data without seeking your explicit consent in the following cases;

- if it is clearly stipulated in the laws,
- if you are not able to disclose your consent as a data owner due to the actual impossibility, or if your consent is not legally valid, or if it is necessary to process your personal data in order to protect your or someone else's life or bodily integrity,
- if it is necessary to process personal data belonging to the parties to the agreement, provided that it is directly related to the establishment or performance of the agreement you have concluded/signed with Günaydınlar Organik and/or other real and/or legal persons,
- if it is mandatory for Günaydınlar Organik to fulfill a legal obligation,
- if your personal data is made public by you,
- if data processing is mandatory for the establishment, use, or protection of a right,
- if data processing is mandatory for the legitimate interests of Günaydınlar Organik, provided that it does not harm your fundamental rights and freedoms.

4.4. PURPOSE OF PROCESSING PERSONAL DATA

Günaydınlar Organik processes personal data limited to the purposes and conditions within the scope of personal data processing conditions specified in the Law. In this context, Günaydınlar Organik's personal data processing purposes are;

- Issuing invoices for our services,
- Outsourcing services,
- Execution of contracts made with our business partners and other third parties and ensuring the commercial security of these persons/institutions,
- Provision of the necessary information in line with the demands and inspections of regulatory and supervisory institutions and official authorities
- Execution and follow-up of human resources policies in terms of employees and employee candidates,

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- Fulfilling legal obligations,
- Determining and implementing Günaydınlar Organik's commercial and business strategies,
- Execution/follow-up of Günaydınlar Organik's financial reporting and risk management processes,
- Execution and follow-up of Günaydınlar Organik's legal affairs,
- Creating and following visitor records.

4.5. TRANSFER OF PERSONAL DATA

Günaydınlar Organik may transfer the personal data of the data owner by taking the necessary security measures in line with the personal data processing purposes specified in the article 4.4 of this Policy in accordance with the regulations stipulated in Articles 8 and 9 of the LPPD. With this Policy, personal data of data owners can be transferred to the categories listed below;

- Contracted organizations (our business partners) that Günaydınlar Organik receives services that are complementary or extension of its activities,
- Banks and insurance companies,
- Private/public audit organizations,
- Affiliates in which Günaydınlar Organik is a shareholder,
- Courier companies,
- Institutions and organizations that provide necessary training to employees on occupational health and safety,
- Cooperatives affiliated with Günaydınlar Organik,
- Suppliers of Günaydınlar Organik,
- Legally authorized public/private institutions and organizations.

4.6. STORAGE AND DISPOSAL OF PERSONAL DATA

Personal data are collected by means of automatic and non-automatic methods in verbal or written media such as website, e-mail, telephone, contracts, written form/report etc. by Günaydınlar Organik within the scope of the personal data processing conditions and purposes specified in articles 5 and 6 of the LPPD. The rights of personal data owners under article 11 of the LPPD are as follows;

- Learning whether personal data is processed,
- Requesting information if personal data has been processed,
- Learning the purpose of processing personal data and whether they are used appropriately for their purpose,
- To know the third parties to whom personal data are transferred domestically or abroad,
- To request correction of personal data in case of incomplete or incorrect processing,
- To request the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of the LPPD,
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- to request the transactions made to be notified to third parties to whom personal data have been transferred pursuant to clauses (d) and (e) of the article 11/1 of LPPD,
- Object to the occurrence of a disadvantageous result by means of analyzing the processed data exclusively through automated systems,
- Requesting the compensation of the damage in case of suffering due to the processing of personal data illegally.

Claims regarding the above-mentioned rights are mailed in written form to the address of Günaydınlar Organik at Cumhuriyet Cad. 96 / E Erbeyli / İncirliova / Aydın. The requests duly submitted to Günaydınlar Organik are finalized within thirty days at the latest.

On the other hand, in accordance with Article 28 of the LPPD, Günaydınlar Organik has no disclosure obligation in the following cases;

- 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 anonymizing them via official statistics,
- 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 administrative authorities in relation to the investigation, prosecution, trial, or execution proceedings.

Günaydınlar Organik takes the necessary technical and administrative security measures regarding the storage of the personal data of data owners in electronic and physical environments. Günaydınlar Organik calculates the personal data retention period by taking into account the periods specified in other relevant legislation, especially in the legislation of cooperatives. Despite the expiration of these periods, personal data of individuals will continue to be processed and stored, if at least one of the personal data processing criteria specified in the legislation is met. Personal data will be destroyed by Günaydınlar Organik in case personal data processing purposes cease to exist and the personal data processing conditions stipulated in the Law became invalid.

4.7. INFORMING THE PERSONAL DATA OWNERS AND THEIR RIGHTS

Within the scope of LPPD, S.S. Günaydınlar Organik Agricultural Sales Cooperatives Union operating at the address Cumhuriyet Cad. 96 / E Erbeyli / İncirliova / Aydın is the data controller. Personal data is processed by Günaydınlar Organik in line with the purposes stipulated in article 4.4 of this Policy, and they can be transferred in accordance with the article 4.5 of this Policy.

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In addition, provided that the purpose and basic principles of the LPPD are complied with, article 10 regulating the obligation of disclosure of the data controller, excluding the right to demand compensation, Article 11 regulating the rights of the person concerned, and Article 16 regulating the obligation to register in the Registry of Data Controllers does not apply in the following cases;

- Processing of personal data is necessary for the prevention of crime, or criminal investigation,
- Processing of personal data made public by the data owner himself,
- The processing of personal data is necessary for the execution of supervisory or regulatory duties and disciplinary investigation or prosecution by the commissioned 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.

4.8. MEASURES TAKEN FOR PERSONAL DATA SECURITY

Günaydınlar Organik prevents unlawful processing of the personal data it processes and unlawful access to the data and takes the necessary measures to ensure the appropriate security level to protect the data in accordance with Article 12 of the LPPD. In this context;

- Software including virus protection systems and network security are used.
- Log records are kept.
- Up-to-date antivirus systems that regularly scan the information system network and detect threats are used to protect against malicious software.
- Employees with technical expertise are employed.
- The authority to access personal data processed within the body of Günaydınlar Organik is limited to certain employees.

4.9. DATA PROCESSING ACTIVITIES PERFORMED ON THE ENTRY POINTS OF AND WITHIN GUNAYDINLAR ORGANIK AGRICULTURAL FACILITIES, AND WEBSITE VISITORS

In order to ensure security in Günaydınlar Organik Tarım facilities, guest entrances and exits are monitored via security camera surveillance. The security camera surveillance aims to protect the interests of Günaydınlar Organik and the third parties regarding safety. This monitoring activity is carried out in accordance with the LPPD, Law on Private Security Services, and the relevant legislation. Necessary technical and administrative measures are taken by Günaydınlar Organik in accordance with Article 12 of the LPPD to ensure the security of personal data obtained as a result of camera surveillance. The data obtained while monitoring guest entry and exits are processed for this purpose only.

The movements of the visitors on the Günaydınlar Organik corporate website are recorded by technical means to guide them to perform their transactions properly on the website.

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For detailed information, you can access our Privacy Policy on <http://www.gunaydins.org>.

4.10. DELETING, ELIMINATING, AND ANONYMIZING OF PERSONAL DATA

Pursuant to Article 7 of the LPPD and the Regulation on Deletion, Elimination, and Anonymization of Personal Data; despite the fact that it has been processed in accordance with the provisions of the relevant law, the personal data will be deleted, destroyed, or anonymized by Günaydınlar Organik, either ex officio or upon the request of the personal data owner in the event that the reasons for its processing disappear.

5. MISCELLANEOUS

In case of inconsistency between the provisions of the LPPD and other relevant legislation and this Policy, the provisions of the LPPD and other relevant legislation will be preferential.

6. REVISION OF THE POLICY

Günaydınlar Organik can make changes in this Policy at any time.

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