

SİNCER LOJİSTİK EMLAK BÜJİTERİ DİŞ TİCARET LTD. ŞTİ. DISCLOSURE STATEMENT PROCESSING of PERSONAL DATA

As Sincer Lojistik Emlak Bujiteri Dış Ticaret Ltd. Şti, within the scope of the Law on the Protection of Personal Data ("KVKK), we prepared this disclosure text in order to inform our customers, business connections and our users using our website in terms of the processing, storage and transfer of your personal data within the framework of our activities conducted in business Law, Social Security, SSI incentives, finance and business management sector.

What is General Data and Private Personal Data?

Any information relating to a specific or identifiable real person is defined as personal data.

Data in relation to race, ethnic origin, political opinion, philosophic belief, religion, sect or other beliefs, appearance, membership to associations, foundations or unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data.

The processing of private personal data without the express consent of the relevant person is prohibited. Personal data other than health and sexual life may be processed without needed the express consent of the person concerned in the circumstances stipulated in the law. Personal data relating to health and sexual life; can only be processed for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and caring services, planning and management of health-care services as well as their financing, by any person or authorized institutions and organizations that have confidentiality obligation, without seeking explicit consent of the data subject, In the processing of private personal data , it is also necessary to take adequate measures determined by the board.

What Data is Collected and What is Our Purpose to Collect Data?

Within the scope of the services we provide in the logistics sector, we collect the following data:

1. Identity Information
2. Contact Informations

3. Personal information (Entity)
4. Location data
5. Legal Process
6. Customer Process
7. Physical Venue Security
8. Process Security
9. Professional Experience
10. Audio-visual records.
11. Health Information
12. Conviction and Security Measures

Data Category	Identity Information
Description	are the data related to the identification of the person.
whom collected from	It is collected from workers, company partners, trainees, supplier employees, officials, people who buy products or services.
Content	is such as Name- Surname, RoT ID number, Tax Number, SSI registry number, ID copy, signature
Purpose of Data Collecting	<ul style="list-style-type: none"> • Fulfilment of Obligations Arising from the Labour Contract and Legislation for Employees • Conducting Processes for Fringe Benefits and Interests for Employees • Conducting Audit / Ethics Activities • Conducting Training Activities • Conducting Access Authorizations • Conducting Activities in compliance with Legislation • Conducting Financing and Accounting affairs • Conducting Assignment Processes • Following-up and Conducting Legal Affairs • Planning Human Resources Processes • Conducting / Supervising Business Activities • Conducting Occupational Health / Safety Activities • Conducting Logistics Activities

	<ul style="list-style-type: none"> • Conducting Goods / Services Production and Operation Processes • Execution Of Storage And Archive Activities • Conducting Contracting Processes • Follow-up of Requests / Complaints • Informing Authorized Persons, Institutions and Organizations • Conducting Management Activities
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Data Category	Contact Informations
Description	Are the personal data which enables contact with the person.
whom collected from	It is collected from workers, company partners, trainees, supplier employees, officials, people who buy products or services.
Content	Is data such as home and work address, mobile phone number, home phone number, postal address and e-mail address.
Purpose of Data Collecting	<ul style="list-style-type: none"> • Conducting Processes of Information Security Management • Fulfilment of Obligations Arising from the Labour Contract and Legislation for Employees • Conducting Processes for Fringe Benefits and Interests for Employees • Conducting Training Activities • Conducting Access Authorizations • Conducting Activities in compliance with Legislation • Conducting Financing and Accounting affairs • Conducting Assignment Processes • Following-up and Conducting Legal Affairs • Conducting Communication Activities • Planning Human Resources Processes • Conducting / Supervising Business Activities • Conducting Occupational Health / Safety Activities • Conducting Logistics Activities • Conducting Processes of procurement of Good / Service • Conducting Goods / Services Sale Processes

	<ul style="list-style-type: none"> • Conducting Goods / Services Production and Operation Processes • Execution Of Storage And Archive Activities • Conducting Contracting Processes • Execution Of Supply Chain Management Processes • Informing Authorized Persons, Institutions and Organizations • Conducting Management Activities
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Data Category	Personnel Data
Description	is worker data that must be kept by the employer as required by legislation.
whom collected from	It is collected from workers
Content	Such as, ID informations, contact information, Position/Title Information, diplomas and certificates, work history, details, previous work received from the service/working document Resume, Let (administrative and annual leave), Photography, about running official correspondence, statement of SSI, SSI declaration of departure from work, criminal record, military service discharge Information, health report, minimum living allowance informations.
Purpose of Data Collecting	<ul style="list-style-type: none"> • Fulfilment of Obligations Arising from the Labour Contract and Legislation for Employees • Conducting Processes for Fringe Benefits and Interests for Employees • Conducting Training Activities • Conducting Access Authorizations • Conducting Activities in compliance with Legislation • Conducting Financing and Accounting affairs • Conducting Assignment Processes • Following-up and Conducting Legal Affairs • Conducting Communication Activities • Planning Human Resources Processes

	<ul style="list-style-type: none"> • Conducting / Supervising Business Activities • Conducting Occupational Health / Safety Activities • Conducting Logistics Activities • Execution Of Storage And Archive Activities • Conducting Contracting Processes • Follow-Up Of Claims/Complaints • Conduct Of Talent / Career Development Activities • Informing Authorized Persons, Institutions and Organizations • Conducting Management Activities
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Data Category	Location Data
Description	It is the necessary information to maintain the logistics activities that are our main activity without any problems.
whom collected from	Location data is collected from the vehicles used by our company drivers and supplier drivers.
Content	Within the scope of our road transport activity, location information of vehicles such as trucks and drivers is accessed in order to track their freight positions.
Purpose of Data Collecting	<ul style="list-style-type: none"> • Fulfilment of Obligations Arising from the Labour Contract and Legislation for Employees • Conduct Of Audit / Ethical Activities • Conducting Activities in compliance with Legislation • Following-up and Conducting Legal Affairs • Conducting Communication Activities • Conducting / Supervising Business Activities • Conducting Occupational Health / Safety Activities • Conducting Logistics Activities • Conducting Goods / Services Production and Operation Processes • Execution Of Storage And Archive Activities • Conducting Contracting Processes • Ensuring Safety of Movable Goods and Resources

	<ul style="list-style-type: none"> • Informing Authorized Persons, Institutions and Organizations • Conducting Management Activities
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Data Category	Legal Process
Description	is the legal data collected to ensure the legal security of the company within the scope of obligations arising from the legislation.
whom collected from	It is collected from workers, company partners, trainees, supplier employees, officials, people who buy products or services.
Content	Documents such as articles from official institutions, articles from courts, notices of foreclosure, information and documents related to lawsuits filed
Purpose of Data Collecting	<ul style="list-style-type: none"> • Fulfilment of Obligations Arising from the Labour Contract and Legislation for Employees • Conducting Processes for Fringe Benefits and Interests for Employees • Conducting Audit / Ethics Activities • Conducting Activities in compliance with Legislation • Conducting Financing and Accounting affairs • Following-up and Conducting Legal Affairs • Planning Human Resources Processes • Conducting / Supervising Business Activities • Conducting Occupational Health / Safety Activities • Execution Of Storage And Archive Activities • Conducting Contracting Processes • Follow-up of Requests / Complaints • Informing Authorized Persons, Institutions and Organizations • Conducting Management Activities

Data Category	Customer Process
Description	Customers' request, invoice, stamp-signature information and suppliers ' stamp-signature information.

whom collected from	It is collected from supplier employees, supplier officials, product or service recipients.
Content	Customers' request, invoice, stamp-signature information and suppliers ' stamp-signature information.
Purpose of Data Collecting	<ul style="list-style-type: none"> • Conducting Activities in compliance with Legislation • Conducting Financing and Accounting affairs • Following-up and Conducting Legal Affairs • Conducting Communication Activities • Conducting / Supervising Business Activities • Receiving and Assessing Suggestions for Improvement of Business Processes • Conducting Business Continuity Activities • Conducting Logistics Activities • Conducting Processes of procurement of Good / Service • Conducting Goods / Services Sale Processes • Conducting Goods / Services Production and Operation Processes • Execution Of Storage And Archive Activities • Conducting Contracting Processes • Ensuring Security of Data Controller Operations • Informing Authorized Persons, Institutions and Organizations • Conducting Management Activities

Data Category	Physical Venue Security
Description	Measures to ensure the security of the physical space
whom collected from	is collected from employee candidates, employees, company partners, potential product or service buyer, trainee, supplier employee, supplier officer, product or service buyer, visitors.
Content	Camera records

Purpose of Data Collecting	<ul style="list-style-type: none"> • Ensuring Physical Space Security • Conducting / Supervising Business Activities • Conducting Occupational Health / Safety Activities • Conducting Logistics Activities • Ensuring Safety of Movable Goods and Resources
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Data Category	Process Security
Description	it is the data such as IP address information, internet site entry and exit information, password and keyword
whom collected from	It is collected from workers and company partners.
Content	it is the data such as IP address information, internet site entry and exit information, password and keyword
Purpose of Data Collecting	<ul style="list-style-type: none"> • Conducting Processes of Information Security Management • Conducting Activities in compliance with Legislation • Following-up and Conducting Legal Affairs • Conducting / Supervising Business Activities • Execution Of Storage And Archive Activities • Ensuring Security of Data Controller Operations

Data Category	Professional Experience
Description	it is data such as diploma information, courses attended, vocational training information, certificates, transcript information, work experience
whom collected from	It is collected from workers
Content	it is data such as diploma information, courses attended, vocational training information, certificates, transcript information, work experience

Purpose of Data Collecting	<ul style="list-style-type: none"> • Fulfilment of Obligations Arising from the Labour Contract and Legislation for Employees • Conducting Processes for Fringe Benefits and Interests for Employees • Conducting Training Activities • Conducting Assignment Processes • Planning Human Resources Processes
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Data Category	Audio-visual records.
Description	Measures to ensure the security of the physical space
whom collected from	is collected from employee candidates, employees, company partners, potential product or service buyer, trainee, supplier employee, supplier officer, product or service buyer, visitors.
Content	Camera records
Purpose of Data Collecting	Ensuring Physical Space Security

Data Category	Health Information
Description	It is the health data that workers need to be able to work.
whom collected from	It is collected from workers
Content	Disability Information, blood group information, personal health information, equipment and prosthetics information etc.
Purpose of Data Collecting	<ul style="list-style-type: none"> • Fulfilment of Obligations Arising from the Labour Contract and Legislation for Employees • Conducting Processes for Fringe Benefits and Interests for Employees • Conducting Occupational Health / Safety Activities • Planning Human Resources Processes

Data Category	Conviction and Security Measures
Description	Information on criminal convictions and security measures etc.
whom collected from	It is collected from workers
Content	Information on criminal convictions and security measures etc.
Purpose of Data Collecting	<ul style="list-style-type: none"> • Fulfilment of Obligations Arising from the Labour Contract and Legislation for Employees • Planning Human Resources Processes

What is the Legal Reason for the Collection of Your Data?

We process personal data for reasons arising from our obligations under the relevant legislation (legal obligation), contractual relations, obligations under the law and legitimate interests within the scope of our services performed in the logistics sector.

How We Collect Your Data?

We collect data through printed forms, sometimes directly via electronic forms or through meetings / negotiations.

Transfer of Your Personal Data to a Third Party

Your personal data is shared, where necessary, with persons and institutions authorized by a court order or at the request of an administrative authority expressly authorized by law, in accordance with our obligations set forth in the legislation, in cases specified in the legislation. In addition, data can be shared with suppliers and related third parties in order to maintain our business activities.

Transfer Of Personal Data Abroad

Your personal data may only be transferred abroad if there is one of the following limited circumstances:

- If you have express consent,
- If there is sufficient protection in the country where the data will be transferred and the conditions stipulated in the KVKK
- Although the conditions envisaged in the KVKK and the country where the data will be transferred do not have adequate protection, there is a commitment made by the relevant country and the permission of the Personal Data Protection Board ("**Board**") to provide adequate protection.

Retention Times Of Your Personal Data

The retention periods of your personal data are as follows:

- If a provision in the law or related legislation determines a period of time for the data to be stored, the data must be kept at least for that period. The data in question is deleted at the end of the specified period.
- If no period of time has been set by law regarding the storage of the data we process, such data shall be stored in accordance with the relationship between us and for the period specified in the contract to which we are parties and shall be deleted-without your request - if this relationship ends or the period specified in the contract expires.
- If a period of time is stipulated in the legislation regarding the storage of data and you request that such data be deleted before that time, this request cannot be made. Where the time period for storing data is not determined in the legislation, your data will be deleted immediately and within 30 days at the latest if you have a request to delete the data.

Your Rights Regarding Your Personal Data

Your rights regarding your personal data are as follows:

1. to know whether your personal data is being processed or not,
2. Request for information if your personal data is processed,

3. Find out what the purpose of processing your personal data is and whether this purpose is adhered to,
4. To know the third parties to whom your personal data are transferred at domestic or abroad,
5. To request your personal data correction if it is incomplete or misinterpreted,
6. to request that your personal data be deleted or destroyed in accordance with the provisions of the KVKK,
7. If you request that your personal data be deleted or destroyed by the correction of incomplete or incorrect data, we request that you be notified of this to third parties to whom we have transferred your data
8. Taking objection against this situation in case there is a situation against you via analyzing your personal data through automatic systems and
9. Requesting for removal of damage in case you have suffered damage due to the unlawful processing of your personal data

Usage of Rights

You may submit your requests for the exercise of your rights regarding your personal data by this method if a separate method has been determined by the KVK Board, without prejudice to other methods determined by the board or with an application form of Sincer Lojistik Emlak Bujiteri Dış Ticaret Ltd. Şti or address Pirireis District 1102. Street No: 3/11 Yenişehir/Mersin Yenişehir/Mersin address in written and wet signature or to our you may forward it by sending it to our registered e-mail address sincer@hso1.kep.tr signed with a secure electronic signature. No: 3/11 Yenişehir/Mersin adresine yazılı ve ıslak imzalı olarak ya da sincer@hso1.kep.tr kayıtlı elektronik posta adresimize güvenli elektronik imza ile imzalanmış olarak gönderebilirsiniz. No: 3/11 Yenişehir/Mersin address in written and wet signature or to our you may forward it by sending it to our registered e-mail address sincer@hso1.kep.tr signed with a secure electronic signature.

We reserve the right to refuse the relevant application if there is a mistake/error in the transmitted information and documents or if the application is unauthorized.

Response Time to Regarding Requests the Processing of Personal Data

We evaluate your claims regarding your personal data and respond within 30 days at the latest from the day your claims are received. If our response to your request is negative, we send the reasoned refusal to the address you specified by e-mail or by mail.

How You may Reach Detailed Information about Processing Your Personal Data?

For detailed information about Processing Your Personal Data, you may request us with the “**Application Form**” on our website.