

**BİLİM İLAÇ SANAYİİ VE TİCARET ANONİM ŞİRKETİ**  
**PRIVACY NOTICE ON PRODUCT AND/OR SERVICE PROCUREMENT AND BUSINESS**  
**PARTNERSHIP PROCESSES**

**1. Data Controller**

Your personal data are processed by Bilim İlaç Sanayii ve Ticaret Anonim Şirketi, a joint stock company registered at Istanbul Trade Registry Directorate with the registration number of 79251-0 and having its registered office situated at Kaptanpaşa Mah. Zincirlikuyu Cad. No: 184 Beyoğlu / İstanbul (the “Company”), in its capacity as a data controller, in accordance with the provisions of the Law No. 6698 on the Protection of Personal Data (the “LPPD”) and pursuant to this Privacy Notice on Product and/or Service Procurement and Business Partnership Processes (the “Privacy Notice”).

Our Company respects your rights regarding your privacy and the protection of your personal data, and aims to establish and maintain a relationship with your party that is based on trust. Within this scope, our Company processes your personal data in accordance with all legal regulations on the protection of personal data, particularly the LPPD, and adopts all security measures which are required to ensure the security of your data. This Privacy Policy is intended to provide clarifications on the scope of processing of your personal which are collected within the framework of your potential or existing commercial relationship with our Company or the potential or existing commercial relationship of your employer firm with our Company. For further details on the processing of your personal data by our Company, please visit Bilim İlaç Sanayii ve Ticaret Anonim Şirketi’s Policy on the Protection and Processing of Personal Data, which is accessible from <https://bilim.digitatek.com/kisisel-verilerin-korunmasi>.

**2. The Methods of Collection of Your Personal Data**

Your personal data are collected by our Company wholly or partly by automated means or provided that the process is a part of any data filing system, through non-automated means, from physical and/or electronic environments, via our Company’s websites – particularly [www.bilimilac.com.tr](http://www.bilimilac.com.tr), printed forms, customer services line, e-mail, phone, SMS, facsimile, cargo/mail, open access internet resources, call / communications centers, online meeting / communication platforms, Company information technology systems, internal integrated systems, integrated systems with authorized public institutions and private organizations and information desks, turnstile records and telephone switchboards at our Company’s headquarters and other premises.

**3. The Categories of Your Processed Personal Data and the Purposes for and the Legal Basis of the Processing of Your Personal Data**

**A. In Terms of the Suppliers / Supplier Personnel from which Products and/or Services are Procured and the Business Partners / Business Partner Personnel**

Your personal data categories which are processed within the scope of the conducting and conclusion of proposals and contractual negotiations concerning the establishment and/or execution of the commercial relationship; the management of contractual process (e.g. lease contracts); the formation of existing / potential supplier / business partner lists; the selection of suppliers / business partners and/or supplier / business partner personnel; the management of repairs / maintenance / restoration activities; the management of supplier / business partner communication and satisfaction; the carrying out of operations management; the management of warehouse / logistics activities; the management of requests / complaints / suggestions; the management of security of physical locations; the management of audits / internal audits; the conducting of contract manufacturing and inspection activities; the management of legal and consultancy affairs including the discharge of the statutory obligations and the conducting of disputes, to which the Company is a party and/or in which the Company is involved (e.g. lawsuits / execution proceedings / mediation); the management of the issuance / amendment /cancellation of invoices, payments and collections and other accounting and financial affairs (e.g. current card opening, return/declaration management); the conducting of activities for ensuring business continuity and other

communication activities concerning services; the conducting of occupational health and safety activities in accordance with the legislation; the management of goods / services procurement processes (incl. the creation and confirmation of import declarations and purchase order forms); the management of import and customs clearance processes; the management of security of physical locations; the management of procurement chain processes; the management of communication, audit and reporting within the scope of compliance with the policies and procedures of our group companies; the management of storage and archiving activities; the management of information security activities; and the management of quality standards procedures including product / service / process improvement processes, and the purposes for and the legal basis for the processing of your personal data are thoroughly explained herein below.

**NB:** No special categories of personal data (e.g. religion or blood type information) pertaining to the supplier and/or its personnel or its business partners / the employees of its business partners should be included in the signature circular (list of authorized signatories), power of attorney or other documentation which may be sought during the contract negotiation, execution and performance processes or such documents should be communicated by having such data redacted.

Personal Data Category	Purposes for and Legal Basis of Processing of Personal Data
<b>Identification Data</b>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) being expressly permitted by law, as stipulated in article 5(2)(a) of the LPPD; (ii) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (iii) personal data being revealed to the public by the data subject himself/herself, as stipulated in article 5(2)(d) of the LPPD; (iv) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (v) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting of Emergency Management Processes;</li> <li>• Conducting of Information Security Processes;</li> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Conducting of Activities in accordance with the Legislation;</li> <li>• Conducting of Finance and Accounting Affairs;</li> <li>• Ensuring the Security of Physical Locations;</li> <li>• Carrying out of Assignment Processes;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting of Communication Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Conducting of Occupational Health / Safety Activities;</li> <li>• Attainment and Evaluation of Recommendations for the Improvement of Business Processes;</li> <li>• Conducting of Activities for Ensuring Business Continuity;</li> <li>• Conducting of Logistics Activities;</li> <li>• Conducting of Goods / Services Procurement Processes;</li> <li>• Conducting of Goods / Services Manufacturing and Operations Processes;</li> </ul>

	<ul style="list-style-type: none"> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Conducting of Contractual Processes;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Ensuring the Security of Movable Properties and Resources;</li> <li>• Conducting of the Procurement Chain Management Processes;</li> <li>• Ensuring the Security of the Data Controller's Operations;</li> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>
<b>Contact Details Data</b>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (ii) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iv) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting of Emergency Management Processes;</li> <li>• Conducting of Information Security Processes;</li> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Conducting of Authorizations for Access;</li> <li>• Conducting of Activities in accordance with the Legislation;</li> <li>• Conducting of Finance and Accounting Affairs;</li> <li>• Ensuring the Security of Physical Locations;</li> <li>• Carrying out of Assignment Processes;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting of Communication Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Conducting of Occupational Health / Safety Activities;</li> <li>• Attainment and Evaluation of Recommendations for the Improvement of Business Processes;</li> <li>• Conducting of Activities for Ensuring Business Continuity;</li> <li>• Conducting of Logistics Activities;</li> <li>• Conducting of Goods / Services Procurement Processes;</li> <li>• Conducting of Goods / Services Manufacturing and Operations Processes;</li> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Conducting of Contractual Processes;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Ensuring the Security of Movable Properties and Resources;</li> <li>• Conducting of the Procurement Chain Management Processes;</li> <li>• Ensuring the Security of the Data Controller's Operations;</li> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>

<p><b>Finance Data</b></p>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) being expressly permitted by law, as stipulated in article 5(2)(a) of the LPPD; (ii) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (iii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (v) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Conducting of Activities in accordance with the Legislation;</li> <li>• Conducting of Finance and Accounting Affairs;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Conducting of Goods / Services Procurement Processes;</li> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Conducting of Contractual Processes;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Conducting of the Procurement Chain Management Processes;</li> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>
<p><b>Visual and Audio Recording Data</b></p>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (ii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iii) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting of Communication Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Conducting of Goods / Services Procurement Processes;</li> <li>• Conducting of Goods / Services Manufacturing and Operations Processes;</li> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Conducting of Contractual Processes;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Conducting of the Procurement Chain Management Processes;</li> </ul>

	<ul style="list-style-type: none"> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>
<b>Professional Work Experience Data</b>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) being expressly permitted by law, as stipulated in article 5(2)(a) of the LPPD; (ii) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (iii) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iv) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (v) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting of Emergency Management Processes;</li> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Conducting of Activities in accordance with the Legislation;</li> <li>• Carrying out of Assignment Processes;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Conducting of Occupational Health / Safety Activities;</li> <li>• Attainment and Evaluation of Recommendations for the Improvement of Business Processes;</li> <li>• Conducting of Activities for Ensuring Business Continuity;</li> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Conducting of Contractual Processes;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>
<b>Request / Complaint / Suggestion Data</b>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (ii) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iv) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting of Information Security Processes;</li> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> </ul>

	<ul style="list-style-type: none"> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting of Communication Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Attainment and Evaluation of Recommendations for the Improvement of Business Processes;</li> <li>• Conducting of Activities for Ensuring Business Continuity;</li> <li>• Conducting of Goods / Services Procurement Processes;</li> <li>• Conducting of Goods / Services Manufacturing and Operations Processes;</li> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Conducting of Contractual Processes;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Conducting of the Procurement Chain Management Processes;</li> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>
<b>Legal Action Data</b>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (ii) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iv) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Conducting of Activities in accordance with the Legislation;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Conducting of Contractual Processes;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>
<b>Vehicle Data</b>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (ii) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iv) data processing being required for the</p>

	<p>legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting of Emergency Management Processes;</li> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Conducting of Activities in accordance with the Legislation;</li> <li>• Ensuring the Security of Physical Locations;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Conducting of Logistics Activities;</li> <li>• Conducting of Goods / Services Manufacturing and Operations Processes;</li> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Ensuring the Security of Movable Properties and Resources;</li> <li>• Conducting of the Procurement Chain Management Processes;</li> <li>• Ensuring the Security of the Data Controller's Operations;</li> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>
<p><b>Special Categories of Personal Data (Data concerning Criminal Convictions and Security Measures)</b></p>	<p>Your personal data, as limited with the criminal convictions and security measures, are processed within the scope of foreign trade process, on the basis of the personal data processing condition (legal ground) of being expressly permitted by law, as stipulated in article 6(3)(b) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Conducting of Activities in accordance with the Legislation;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Conducting of Logistics Activities;</li> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul> <p>***<b>NB:</b> The processing of your special categories of personal data pursuant to the exemptions to the LPPD, as listed in article 28 thereof, and the transfer of such personal data within this scope are not subject to the legal condition of the existence of explicit consent.</p>

**B. In Terms of the Dedicated Suppliers / Supplier Personnel Working at our Company's Premises**

Your personal data categories which are processed within the scope of the conducting and conclusion of proposals and contractual negotiations concerning the establishment and/or execution of the commercial relationship; the management of contractual process (e.g. lease contracts); the management of goods / services procurement processes; the selection of dedicated suppliers and/or supplier personnel; the conducting of activities for ensuring business continuity and other communication activities concerning services; the management of repairs / maintenance / restoration activities; the management of the issuance / amendment /cancellation of invoices, payments and collections and other accounting and financial affairs (e.g. current card opening, return/declaration management); the management of dedicated suppliers / supplier personnel requests / complaints / support; the carrying out of operations management; the management of warehouse / logistics activities; the management of import and customs clearance processes; the management of security of physical locations; the formation of dedicated supplier / supplier personnel files; the management of internal / external training, certification and orientation activities; the management of administrative affairs and communications/correspondences (e.g. information / documentation request follow-up and management); the management of dedicated supplier / supplier personnel attendance checks; the management of disciplinary / investigation / ethics activities; the management of entrustment/allocation, inspection and tracking of devices / vehicles / systems; the management of occupational health and safety activities; the carrying out of performance assessments of dedicated supplier / supplier personnel and the reporting thereof to the principal employer; the management of transportation of dedicated supplier / supplier personnel (e.g. provision of service/shuttle vehicles); the management of audits / internal audits; the management of legal and consultancy affairs including the discharge of the statutory obligations and the conducting of disputes, to which the Company is a party and/or in which the Company is involved (e.g. lawsuits / execution proceedings / mediation); the management of communication, audit and reporting within the scope of compliance with the policies and procedures of our stakeholders; the management of storage and archiving activities; the management of information security activities (e.g. the establishment of access/authorization matrix, the keeping of log records, the granting of authorization for access to the system room); and the management of quality standards procedures including product / service / process improvement processes, and the purposes for and the legal basis for the processing of your personal data are thoroughly explained herein below.

**NB:** All medical reports and other health data underlying the eligibility to work documents pertaining to the personnel to be assigned at our Company within the scope of supplier, temporary worker or sub-employer relationship, and their personal files should be retained by the supplier companies, and kept in their own data filing systems as available for submission to the public institutions and organizations and other authorities if and when so required.

Personal Data Category	Purposes for and Legal Basis of Processing of Personal Data
<b>Identification Data</b>	Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) being expressly permitted by law, as stipulated in article 5(2)(a) of the LPPD; (ii) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (iii) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iv) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (v) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:

	<ul style="list-style-type: none"> <li>• Conducting of Emergency Management Processes;</li> <li>• Conducting of Information Security Processes;</li> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Carrying out of Training Activities;</li> <li>• Conducting of Authorizations for Access;</li> <li>• Conducting of Activities in accordance with the Legislation;</li> <li>• Conducting of Finance and Accounting Affairs;</li> <li>• Carrying out of Company / Products / Services Loyalty Processes;</li> <li>• Ensuring the Security of Physical Locations;</li> <li>• Carrying out of Assignment Processes;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting of Communication Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Conducting of Occupational Health / Safety Activities;</li> <li>• Attainment and Evaluation of Recommendations for the Improvement of Business Processes;</li> <li>• Conducting of Activities for Ensuring Business Continuity;</li> <li>• Conducting of Logistics Activities;</li> <li>• Conducting of Goods / Services Procurement Processes;</li> <li>• Conducting of Goods / Services Manufacturing and Operations Processes;</li> <li>• Conducting of Performance Rating Processes;</li> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Conducting of Contractual Processes;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Ensuring the Security of Movable Properties and Resources;</li> <li>• Conducting of the Procurement Chain Management Processes;</li> <li>• Ensuring the Security of the Data Controller's Operations;</li> <li>• Conducting of Talent / Career Development Activities;</li> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>
<p><b>Contact Details Data</b></p>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) being expressly permitted by law, as stipulated in article 5(2)(a) of the LPPD; (ii) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (iii) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iv) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (v) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting of Emergency Management Processes;</li> <li>• Conducting of Information Security Processes;</li> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Carrying out of Training Activities;</li> </ul>

	<ul style="list-style-type: none"> <li>• Conducting of Authorizations for Access;</li> <li>• Conducting of Activities in accordance with the Legislation;</li> <li>• Conducting of Finance and Accounting Affairs;</li> <li>• Ensuring the Security of Physical Locations;</li> <li>• Carrying out of Assignment Processes;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting of Communication Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Conducting of Occupational Health / Safety Activities;</li> <li>• Attainment and Evaluation of Recommendations for the Improvement of Business Processes;</li> <li>• Conducting of Activities for Ensuring Business Continuity;</li> <li>• Conducting of Logistics Activities;</li> <li>• Conducting of Goods / Services Procurement Processes;</li> <li>• Conducting of Goods / Services Manufacturing and Operations Processes;</li> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Conducting of Contractual Processes;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Ensuring the Security of Movable Properties and Resources;</li> <li>• Conducting of the Procurement Chain Management Processes;</li> <li>• Ensuring the Security of the Data Controller's Operations;</li> <li>• Conducting of Talent / Career Development Activities;</li> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>
<b>Professional Experience Data</b> <b>Work</b>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) being expressly permitted by law, as stipulated in article 5(2)(a) of the LPPD; (ii) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (iii) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iv) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (v) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting of Emergency Management Processes;</li> <li>• Conducting of Information Security Processes;</li> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Carrying out of Training Activities;</li> <li>• Conducting of Authorizations for Access;</li> <li>• Conducting of Activities in accordance with the Legislation;</li> <li>• Conducting of Finance and Accounting Affairs;</li> <li>• Ensuring the Security of Physical Locations;</li> <li>• Carrying out of Assignment Processes;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> </ul>

	<ul style="list-style-type: none"> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting of Communication Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Conducting of Occupational Health / Safety Activities;</li> <li>• Attainment and Evaluation of Recommendations for the Improvement of Business Processes;</li> <li>• Conducting of Activities for Ensuring Business Continuity;</li> <li>• Conducting of Logistics Activities;</li> <li>• Conducting of Goods / Services Procurement Processes;</li> <li>• Conducting of Goods / Services Manufacturing and Operations Processes;</li> <li>• Conducting of Performance Rating Processes;</li> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Conducting of Contractual Processes;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Ensuring the Security of Movable Properties and Resources;</li> <li>• Conducting of the Procurement Chain Management Processes;</li> <li>• Ensuring the Security of the Data Controller's Operations;</li> <li>• Conducting of Talent / Career Development Activities;</li> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>
<b>Visual and Audio Recording Data</b>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (ii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iii) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting of Emergency Management Processes;</li> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Carrying out of Training Activities;</li> <li>• Conducting of Activities in accordance with the Legislation;</li> <li>• Ensuring the Security of Physical Locations;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Conducting of Occupational Health / Safety Activities;</li> <li>• Conducting of Activities for Ensuring Business Continuity;</li> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting of Goods / Services Manufacturing and Operations Processes;</li> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Ensuring the Security of Movable Properties and Resources;</li> <li>• Ensuring the Security of the Data Controller's Operations;</li> <li>• Conducting of Talent / Career Development Activities;</li> </ul>

	<ul style="list-style-type: none"> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>
<p><b>Legal Action Data</b></p>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (ii) data processing being required for the data controller’s compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iv) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Conducting of Activities in accordance with the Legislation;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Conducting of Contractual Processes;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>
<p><b>Request / Complaint / Suggestion Data</b></p>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (ii) data processing being required for the data controller’s compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iv) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting of Communication Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Attainment and Evaluation of Recommendations for the Improvement of Business Processes;</li> <li>• Conducting of Activities for Ensuring Business Continuity;</li> <li>• Conducting of Storage and Archiving Activities;</li> </ul>

	<ul style="list-style-type: none"> <li>• Conducting of Contractual Processes;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>
<b>Vehicle Data</b>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (ii) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iv) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting of Emergency Management Processes;</li> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Conducting of Activities in accordance with the Legislation;</li> <li>• Ensuring the Security of Physical Locations;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Conducting of Logistics Activities;</li> <li>• Conducting of Goods / Services Manufacturing and Operations Processes;</li> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Ensuring the Security of Movable Properties and Resources;</li> <li>• Conducting of the Procurement Chain Management Processes;</li> <li>• Ensuring the Security of the Data Controller's Operations;</li> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>
<b>Processing/Transaction Security Data</b>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) being expressly permitted by law, as stipulated in article 5(2)(a) of the LPPD; (ii) the processing of the personal data pertaining to the contracting parties being required, provided that the processing is directly related to the conclusion or performance of the contract, as stipulated in article 5(2)(c) of the LPPD; (iii) data processing being required for the data controller's compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (iv) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (v) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p>

	<ul style="list-style-type: none"> <li>• Conducting of Information Security Processes;</li> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Carrying out of Training Activities;</li> <li>• Conducting of Authorizations for Access;</li> <li>• Conducting of Activities in accordance with the Legislation;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting of Communication Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Conducting of Activities for Ensuring Business Continuity;</li> <li>• Conducting of Goods / Services Manufacturing and Operations Processes;</li> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>
<p><b>Physical Security Data</b></p> <p><b>Location</b></p>	<p>Your personal data within this category are processed on the basis of the personal data processing conditions (legal grounds) of (i) data processing being required for the data controller’s compliance with a legal obligation, as stipulated in article 5(2)(ç) of the LPPD; (ii) data processing being required for the establishment, exercise or protection of a right, as stipulated in article 5(2)(e) of the LPPD; and (iii) data processing being required for the legitimate interests of the data controller, provided not to impair the fundamental rights and freedoms of the data subject, as stipulated in article 5(2)(f) of the LPPD, and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Carrying out of Audit / Ethics Activities;</li> <li>• Conducting of Activities in accordance with the Legislation;</li> <li>• Ensuring the Security of Physical Locations;</li> <li>• Follow-up and Conducting of Legal Affairs;</li> <li>• Carrying out of Internal Audit / Investigation / Intelligence Activities;</li> <li>• Conducting / Inspection of Business Activities;</li> <li>• Conducting of Occupational Health / Safety Activities;</li> <li>• Conducting of Activities for Ensuring Business Continuity;</li> <li>• Conducting of Storage and Archiving Activities;</li> <li>• Follow-up of Requests / Complaints;</li> <li>• Ensuring the Security of Movable Properties and Resources;</li> <li>• Ensuring the Security of the Data Controller’s Operations;</li> <li>• Furnishing of Information to Authorized Individuals, Institutions and Organizations.</li> </ul>

#### 4. The Domestic and Cross-Border Transfer of Your Personal Data to Third Parties

Your personal data which are retained by our Company may be accessed solely by our personnel who have been granted with restricted access authorization for the aforementioned purposes, to the extent as is necessary to fulfill their duties, and will not be transferred to third parties located in Turkey and/or abroad in cases where the conditions for transfer which are regulated in articles 8 and/or 9 of the LPPD and the Regulation on the Procedures and Principles regarding the Transfer of Personal Data Abroad are not satisfied. Nevertheless, your personal data which are processed within the scope of each personal data category listed hereinabove may be transferred to the following recipient groups if the aforesaid personal data processing conditions (legal grounds) for the data category concerned are further satisfied in terms of the purposes for transfer, and in accordance with articles 8 and/or 9 of the LPPD:

- to our **suppliers** (e.g. *human resources, social security, occupational health and safety, legal, finance, customs clearance and tax attorneys, consultants, advisors and auditors and information technology and data hosting service providers*) located in Turkey and/or abroad, as limited with the identification, contact, finance, visual and audio, professional work experience, physical location security, request / complaint / suggestion, legal action, vehicle and transaction security personal data categories and special categories of personal data regarding criminal convictions and security measures, for the purposes as specified hereinabove for each data category, and particularly, in order to ensure the procurement of products and/services for the execution of our Company's operations;
- to our **business and solution partners and customers** located in Turkey and/or abroad, as limited with the identification, contact and professional work experience personal data categories, for the purposes as specified hereinabove for each data category, and particularly, in order to ensure business continuity and establish potential business collaborations within the scope of our Company's operations;
- to Turkish **banks**, as limited with the identification, contact, finance and professional work experience personal data categories, for the purposes as specified hereinabove for each category, and particularly, in order to enable the materialization of payments and other financial transactions;
- to **potential buyers, sellers or other transacting parties** located in Turkey and/or abroad **and their employees, consultants and database service providers involved in the process, who are under a confidentiality obligation**, as limited with the identification, contact, finance, visual and audio, professional work experience, physical location security, request /complaint / suggestion, legal action, vehicle and transaction security personal data categories and special categories of personal data regarding criminal convictions and security measures, for the purposes as specified hereinabove for each data category, and particularly, in order to facilitate the carrying out of the legal and financial due diligence of our Company in case of any potential corporate merger, acquisition, joint venture, de-merger and other structural changes;
- to our **group companies including our Company's affiliates** located in Turkey, as limited with the identification, contact, finance, visual and audio, professional work experience, physical location security, request /complaint / suggestion, legal action, vehicle and transaction security personal data categories and special categories of personal data regarding criminal convictions and security measures, for the purposes as specified hereinabove for each data category, and particularly, in order to enable the conducting of communication, audit and reporting activities;
- to your **principal employer** in Turkey, as limited with the identification, contact, professional work experience, visual and audio, legal action, request / complaint / suggestion, vehicle, transaction security and physical location security personal data categories and special categories of personal data regarding criminal convictions and security measures, for the purposes as specified hereinabove for each data category and particularly, in order to manage the activities of the dedicated suppliers / supplier personnel and the communication of the necessary notifications to the principal employers; and
- to the **authorized public institutions and organizations** in Turkey and/or abroad, as limited with the identification, contact, finance, visual and audio, professional work experience, physical location security, request /complaint / suggestion, legal action, vehicle and transaction security personal data categories and special categories of personal data regarding criminal convictions and security

measures, for the purposes as specified hereinabove for each data category, and particularly, in order to fulfill our Company's statutory obligations and the follow-up the legal affairs thereof.

## **5. The Period for Processing of Your Personal Data**

Your personal data which are acquired during our Company's operations are retained and destroyed pursuant to the general principles and regulations laid down in our Company's policies and procedures on retention and destruction, which are drafted in accordance with primarily, the Constitution, and the LPDD, the Regulation on the Deletion, Destruction and Anonymization of Personal Data and other applicable legislation.

Within this scope, if all of the aforementioned personal data processing conditions cease to exist, your personal data will be destroyed accordingly. Your personal data will then be continued to be processed during the statutory limitation periods pertaining to the specific process. Your personal data which are processed on the basis of the requirement of the attainment of explicit consent for personal data processing will be destroyed at the first destruction period following the revocation of your explicit consent. Please see section 6 of this Privacy Notice for your requests concerning the destruction of your personal data.

## **6. Your Rights under the LPPD**

Pursuant to article 11 of the LPPD, you possess the following rights, as a data subject:

- being informed of whether your personal data are processed by our Company or not;
- requesting information thereon if your personal data have been processed;
- being informed of the purpose for the processing of your personal data and whether such data were used in conformity with such purpose or not;
- knowing the third parties in Turkey or abroad to whom/which personal data are transferred;
- requesting the rectification of incomplete or inaccurate personal data which were processed and the notification, of the operation carried out within this scope, to third parties to whom/which personal data were transferred;
- requesting the deletion or destruction of personal data despite the processing in accordance with the law and other applicable legal provisions, once the reasons necessitating the processing cease to exist, and within this scope, if the personal data were processed incompletely and inaccurately, the notification, of the operation carried out within this scope, to third parties to whom/which personal data were transferred;
- objecting to any outcomes to your detriment by means of the analysis of the processed data exclusively through automated means;
- claiming the compensation of your damages, in case you incur any damages due to the unlawful processing of personal data.

You may submit your application regarding your aforementioned rights, in accordance with the provisions of the Communiqué on the Procedures and Principles of Application to the Data Controller (in writing or electronically, via registered electronic mail (KEP) address, signed with secure electronic signature or mobile signature, or via your e-mail address which had previously been notified to our Company and which is recorded in our system - along with the information / documentation\* verifying your identity in order to enable our Company to confirm your status as an actual right-holder/beneficiary (e.g. Turkish ID number or passport number for citizens of other countries, residential address / workplace address for notification/service, mobile phone / landline /facsimile number, e-mail address) through the channels which are indicated in the applicable legislation, in accordance with the procedures and principles which are laid down in the applicable legislation, particularly via the e-mail address of [KVKKIRTIBAT@bilimilac.com](mailto:KVKKIRTIBAT@bilimilac.com). Your application will be concluded free of charge as soon as possible and within 30 (thirty) days at the latest, depending on the nature of your request; however, in case the

transaction requires an additional cost, you may be charged according to the tariff determined by the Personal Data Protection Board.

\* Please note that no special categories of personal data (e.g. religion or blood type information) should be included in the said documentation.