	Quality Management System	Document No.	QA.POL.08
		Issue Date	30.07.2024
		Revision Date	02.04.2026
		Revision No.	1
Subject	Personal Data Protection Policy		

1. Purpose

In accordance with the Personal Data Protection Law No. 6698 (KVKK), this Policy aims to establish the principles and procedures regarding the lawful processing, protection, retention, and disposal of personal data by KORMAS Electric Motor Industry and Trade Inc. ("KORMAS" or the "Company").

This Policy covers the principles related to the protection of personal data belonging to employees, job applicants, interns, visitors, customers, suppliers, business partners, and other third parties.

2. Scope

This Policy applies to all personal data processed by automated means or by non-automated means provided that they form part of a data recording system.

3. Definitions

Term	Description
Personal Data	Any information relating to an identified or identifiable natural person
Special Categories of Personal Data	of Sensitive data such as health information, biometric data, criminal convictions, etc.
Data Subject	The natural person whose personal data are processed
Data Controller	The natural or legal person determining the purposes and means of processing personal data
Data Processor	The natural or legal person processing personal data on behalf of the Data Controller
KVKK	Personal Data Protection Law No. 6698

4. Data Controller

Pursuant to Law No. 6698, your personal data may be processed by KORMAS in its capacity as the Data Controller.

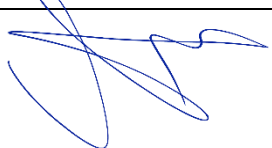
Company Information


- **Company Name:** KORMAS Electric Motor Industry and Trade Inc.
- **Address:** OSB Mahallesi 1. Cadde No:30, Çayırova – KOCAELİ, Türkiye
- **Telephone:** +90 262 658 21 40
- **E-Mail:** sgultekin@kormas.com
- **Website:** www.kormas.com

5. Principles of Personal Data Processing

KORMAS processes personal data in accordance with the following principles:

- Lawfulness and fairness;
- Accuracy and keeping data up to date where necessary;
- Processing for specified, explicit, and legitimate purposes;
- Being relevant, limited, and proportionate to the purposes for which they are processed;

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- Retention for the period required by applicable legislation or by the purpose of processing.

These principles constitute the fundamental obligations under KVKK.

6. Categories of Personal Data Processed

Within the scope of Company activities, the following categories of personal data may be processed:

- Identity information;
- Contact information;
- Employment records;
- Financial information;
- Educational and professional experience information;
- CCTV records;
- Information security data;
- Health information (to the extent required for OHS processes);
- Vehicle and location information;
- Visitor records.

7. Purposes of Processing Personal Data

Personal data may be processed for the following purposes:

- Conducting human resources processes;
- Carrying out occupational health and safety activities;
- Managing production, quality, and operational processes;
- Managing supply chain and procurement processes;
- Managing customer relations and after-sales services;
- Fulfillment of legal obligations;
- Conducting information security processes;
- Ensuring physical security of premises;
- Managing emergency and crisis situations;
- Providing information to authorized public institutions and organizations.

8. Transfer of Personal Data

Personal data may be transferred, in accordance with Articles 8 and 9 of KVKK, to:

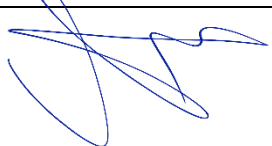
- Authorized public institutions and organizations;
- Authorized private legal entities;
- Suppliers and business partners;
- Audit and consultancy firms;
- Information technology service providers.


9. Protection of Special Categories of Personal Data

Special categories of personal data are processed with additional security measures as stipulated under KVKK.

KORMAS implements technical and administrative measures such as:

- Authorization matrices;
- Access control systems;
- Strong password policies;

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- Antivirus and firewall systems;
- Logging and monitoring activities;
- Data backup systems;
- Physical access controls;
- Employee confidentiality undertakings.

10. Retention and Disposal of Personal Data

Personal data are retained:

- For the periods prescribed by applicable legislation; and
- For the duration required by the purpose of processing.

Upon expiration of these periods, personal data are deleted, destroyed, or anonymized.

11. Rights of Data Subjects

Pursuant to Article 11 of KVKK, data subjects have the right to:

- Learn whether their personal data are being processed;
- Request information if their personal data have been processed;
- Learn the purpose of processing;
- Request correction of incomplete or inaccurate data;
- Request deletion or destruction of personal data;
- Learn the third parties to whom personal data have been transferred;
- Object to analyses performed exclusively through automated systems;
- Request compensation in the event of damages resulting from unlawful processing.

These rights are explicitly regulated under KVKK.

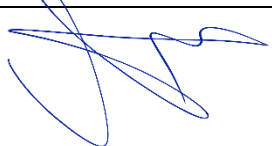
12. Application Procedure

Data subjects may submit their requests under KVKK to KORMAS in writing, via registered electronic mail (KEP), secure electronic signature, or through the e-mail address registered in the Company systems.

Applications shall be evaluated and finalized within the periods specified by applicable legislation.

13. Policy Updates

KORMAS reserves the right to amend this Policy in line with changes in legislation or operational requirements. The updated version of the Policy shall be published through the Company's official communication channels.

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