

## KITA ULAŖTIRMA HİZ. TİC. A.Ş. PRIVACY POLICY

KITA ULAŖTIRMA HİZ. TİC. A.Ş. Inc. as part of the Law No. 6698 on the Protection of Personal Data (“KVKK”) and related legislation, we have prepared this privacy policy in order to inform

our customers, business connections and the internet regarding the processing, storage and transfer of your personal data within the framework of “Business Law”, “Social Security” and our activities in finance and business management sectors.

### What data do we process and the purpose of processing?

We collect your data below as part of the services we provide in the logistics industry:

- 1.ID information
2. Contact information
3. Data of family members
4. Financial data
5. Location data
6. Social Media Data
7. Personal HR data
8. Customer Transaction
9. Physical Security

<b>Data Category</b>	<b>ID Information</b>
<b>Description</b>	Data related to the identification of a person.
<b>From whom</b>	We collect from employees, trainees, candidates, customers, business partners (shipowners, drivers, ship captains, etc.), fair participants, event participants, visitors and business contacts.
<b>Content</b>	Name-surname, Turkish ID number, tax number, SGK registration number, ID copy, signature data.

<p><b>Purpose of processing</b></p>	<p>We collect personal data <b>from the potential customers</b>, for the purposes of Invoicing, Execution of Goods / Services Sales Processes, Execution of Advertising / Campaign / Promotion Processes, Execution of Goods / Services After Sales Support Services, Execution of Goods / Services Purchasing Processes, Execution of Customer Relationship Management Processes; <b>from the visitors</b> in order to ensure security at the entrance and exit of the building, in order to carry out the Advertising / Campaign / Promotion Processes, to carry out the Marketing Analysis Studies and to carry out the Communication Activities. We collect personal data <b>from business contacts</b> in the scope of our Legal Obligations within the scope of Execution / Control of Business Activities, Execution of Communication Activities, Execution of Goods / Services Purchasing Processes, Execution of Logistics Activities.</p> <p>We are obliged to record the identity information of <b>our employees and trainees</b> in accordance with labor and social security legislation.</p> <p>To evaluate the identity information of <b>our candidates</b> for job applications; and also we collect the data of the people with whom we have a <b>supplier, subcontractor and similar business relationship</b> in order to fulfill our commercial requirements and obligations and, if applicable, our contractual obligations.</p>
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<p><b>Data Category</b></p>	<p><b>Contact Information</b></p>
<p><b>Description</b></p>	<p>Personal data that enables communication with the person.</p>
<p><b>From whom</b></p>	<p>We collect contact information; from employees, trainees, employee candidates, customers, potential customers, visitors, suppliers and business contacts.</p>
<p><b>Content</b></p>	<p>Home and work address are data such as mobile phone number, home phone number, postal address and e-mail address.</p>
<p><b>Purpose of processing</b></p>	<p>We collect personal data for communication with our customers, business connections and within the scope of our services and</p>

	<p>commercial activities in the logistics sector; and from visitors in order to create and track visitor records.</p> <p>We are obliged to record the contact information of our employees and trainees in accordance with labor and social security legislation.</p> <p>We collect from our potential customers within the scope of Advertising / Campaign / Promotion Processes, Strategic Planning Activities, Organization and Event Management activities.</p> <p>We collect contact information of our candidates to communicate the results of job applications. We collect the data of suppliers, subcontractors and people with whom we have a similar business relationship in order to fulfill our commercial requirements and obligations and if any, our contractual obligations.</p>
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<b>Data Category</b>	<b>Data of Family Members</b>
<b>Description</b>	Personal data of the family members of the person concerned.
<b>From whom</b>	We collect data from family members from employees.
<b>Content</b>	Family members name-surname, T.C. Identification number, marital status information, number of children, home and work address, mobile phone number, home phone number, postal and e-mail address.
<b>Purpose of processing</b>	We are obliged to record the family members' information of our employees in accordance with the labor and social security legislation.

<b>Data Category</b>	<b>Finance Data</b>
<b>Description</b>	Bank account information, tax plate, salary foreclosures etc. data such

	as records related to financial cuts.
<b>From whom</b>	We collect financial data from our customers, suppliers, employees and third parties with whom we collaborate.
<b>Content</b>	Data such as wages, signature circular, salary, bank account and tax number.
<b>Purpose of processing</b>	<p>We are obliged to record the financial information of our employees in accordance with the labor and social security legislation.</p> <p>We collect the data of the people with whom we have a business relationship; for our commercial requirements and obligations and, if applicable, to fulfill our obligations in contracts.</p>

<b>Data Category</b>	<b>Location Data</b>
<b>Description</b>	The necessary information to carry out logistic activities – our core activity- smoothly.
<b>From whom</b>	We collect location data from our driver employees and drivers of our suppliers.
<b>Content</b>	Within the scope of our road transport activity, we access the location information of trucks, etc. and drivers, in order to track the freight positions.
<b>Purpose of processing</b>	We collect freight location information from our driver employees and drivers of third-party vendors for the Execution / Control of Business Activities, Execution of Logistics Activities, Execution / Control of Business Activities, and Logistics Activities.

<b>Data Category</b>	<b>Social Media Information</b>
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<b>Description</b>	It is the data that we collect from our employees in order to carry out our communication activities.
<b>From whom</b>	We are connected to our employees' social media accounts.
<b>Content</b>	Social media account, like information and comment data
<b>Purpose of processing</b>	We are connected to our staff's social media accounts in order to promote the activities we share in our social media accounts and to reach a wide audience.

<b>Data Category</b>	<b>Personal HR Data</b>
<b>Description</b>	It is the necessary information for maintaining the business relationship without any problems.
<b>From whom</b>	We collect Personal HR data from our employees.
<b>Content</b>	Identity information, contact information, Position / title information, Diploma and certificates, Work history and details, Testimonial / service / work document received from the previous workplace, CV, Leave (administrative and annual leave), Photograph, Official correspondence about the employee, SSI recruitment information such as entry declaration, SSI resignation declaration, Criminal record record, Military Disclosure Information, Health Report, AGI information.
<b>Purpose of processing</b>	We collect the service contract we make with the employees, in accordance with the legislation we are subject to and our legitimate interests.

<b>Data Category</b>	<b>Customer Transaction</b>
<b>Description</b>	Requests, invoice, stamp-signature information of customers and stamp-signature information of suppliers.
<b>From whom</b>	We collect from our customers and suppliers.
<b>Content</b>	Requests, invoice, stamp-signature information of customers and stamp-signature information of suppliers.
<b>Purpose of processing</b>	Conducting / Auditing Business Activities, Executing Logistics Activities, Executing Contract Processes, Executing Supply Chain Management Processes, Executing Goods / Services Production and Operations Processes.

<b>Data Category</b>	<b>Physical Security</b>
<b>Description</b>	Measures to ensure the security of physical places
<b>From whom</b>	We collect from employees and visitors.
<b>Content</b>	Visitor entry and exits and CCTV (closed circuit camera recording images).
<b>Purpose of processing</b>	We collect the data of our employees and visitors for the purpose of creating and tracking visitor records, ensuring physical security, conducting / auditing business activities.

### The lawful basis for data processing

Within the scope of our services we provide in the logistics sector; We operate due to our legal obligations (legal obligations), contractual relationships, legal obligations and legitimate interests.

### **How do we collect data?**

We collect data through printed forms, sometimes directly through forms in electronic form or through meetings / interviews.

### **Transfer to Third Parties**

Your personal data; where necessary, in accordance with our obligations stipulated in the legislation, in cases specified in the legal regulations, they are shared with individuals and institutions authorized by a court decision or by the request of the administrative authority, which is clearly authorized by the law. In addition, it may be shared with related third parties for the maintenance of our business activities.

### **Transfer to outside of Turkey**

Your personal data can only be transferred abroad if one of the following holds:

- If you have explicit consent,
- If the conditions envisaged in the KVKK and the country where the data will be transferred have sufficient protection
- 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.

### **Data Retention Period**

The retention periods of your personal data are as follows:

- If a deadline for data retention has been determined by a provision in the law or related legislation, the data must be kept for at least this period. The mentioned data are deleted at the end of the specified period.
- If a period has not been determined by law regarding the storage of the data we process, the said data; it is stored in accordance with the relationship between us and for the period specified in the contract with which you are a party, and if this

relationship ends or the period specified in the contract expires, it is deleted without your request.

- Your request cannot be fulfilled if a period is foreseen in the legislation regarding data retention and you are requested to delete such data before this period. If the time for data retention is not specified in the legislation, if you have a request to delete the data, your data will be deleted immediately and within 30 days at the latest.

## **Your Rights Regarding Your Personal Data**

The rights you have regarding your personal data are as follows:

1. To be informed whether your personal data is processed or not,
2. If your personal data is processed, requesting information about it,
3. To be informed on what the purpose of processing your personal data is and whether this purpose is complied with,
4. To be informed on which parties data is transferred domestically or abroad,
5. Requesting correction of your personal data in case of missing or incorrect processing,
6. Requesting the deletion or destruction of your personal data in accordance with the provisions of KVKK,
7. If you request that your personal data be deleted or destroyed by correcting incomplete or incorrect data, requesting that this situation be reported to the third parties to whom we have transferred your data,
8. If a situation occurs against you by analyzing your personal data through automated systems, an objection to this situation, and
9. If you are harmed due to unlawful processing of your personal data, requesting the removal of such damage.

## **Exercise of Rights**

Without prejudice to other methods determined by the (KVKK) The Board, your requests for exercising your rights regarding your personal data, includes sending the Data subject application form to İstanbul Ticaret Sarayı, Kat 5 Oruç Reis Mh. Vadi Cd. No. 108 Giyimkent, Esenler 34235 İstanbul, Turkey to address signed by the sender or you can send to the KEP registered e-mail address [kitalastirma@hs03.kep.tr](mailto:kitalastirma@hs03.kep.tr) or [kvkk@kitalogistics.com](mailto:kvkk@kitalogistics.com) signed with secure electronic signature.

We reserve the right to reject the relevant application if there is an error in the information and documents submitted or if the application is unauthorized.



## **Response Time to Requests Regarding the Processing of Personal Data**

We evaluate your claims regarding your personal data and respond within 30 days at the latest from the day we receive your requests. In case of a negative response to your request, we send the reasoned rejection reasons to the address you specified via e-mail or mail.

## **How can you get more detailed information about the processing of your personal data?**

For more detailed information about the processing of your personal data, you can also request us with the "Data Subject Application Form" on our website.