PERSONAL DATA PROTECTION AND PROCESSING POLICY

**Document Name :**

Hars Traktörve Yedek Parça Üretimi Otomotiv Sanayi İç ve Dış Ticaret Pazarlama Anonim Şirketi Personal Data Protection And Processing Policy.

**Target Audience :**

All natural persons whose personal data is processed by Hars Traktörve Yedek Parça Üretimi Otomotiv Sanayi İç ve Dış Ticaret Pazarlama Anonim Şirketi

**Prepared By :**

Hars Traktörve Yedek Parça Üretimi Otomotiv Sanayi İç ve Dış Ticaret Pazarlama Anonim Şirketi

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**Approve :**

Approved by ‘’ Hars Traktörve Yedek Parça Üretimi Otomotiv Sanayi İç ve Dış Ticaret Pazarlama Anonim Şirketi ‘’ Management

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**SECTION 1**

**1.1. ENTRY**

Personal data protection is one of the priorities of Hars Traktörve Yedek Parça Üretimi Otomotiv Sanayi İç ve Dış Ticaret Pazarlama Anonim Şirketi ( Company ).

This Hars Traktörve Yedek Parça Üretimi Otomotiv Sanayi İç ve Dış Ticaret Pazarlama Anonim Şirketi and the protection of personal data processing policy ( policy ) within the framework of personal data processing activities performed by the company in the conduct of the company's data processing activities and policies adopted personal data protection law No. 6698 ( Law ) describes the basic principles adopted in respect of compliance with the regulations is located, and thus our company provides the necessary transparency in informing the owners of personal data. Fully aware of our responsibility to this extent, your personal data is processed and protected under this policy.

**Hars Traktör ve Yedek Parça Üretimi Otomotiv Sanayi İç ve Dış Ticaret Pazarlama Anonim Şirketi**

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**1.2. Content**

This policy applies to all personal data of persons other than employees of our company that is automated or processed by non-automated means, provided that it is part of any data recording system. Detailed information about such personal data holders can be accessed from the personal data holders document of this policy.

**1.3. IMPLEMENTATION OF POLICY AND RELATED LEGISLATION**

The legal regulations in force regarding the processing and protection of personal data will find application area first. If there is a discrepancy between the current legislation and the policy, our company agrees that the current legislation will find an application area. The policy regulates the rules laid down by the relevant legislation by embodying them within the scope of company practices.

**1.4. POLICY ENFORCEMENT**

This policy prepared by our company is dated 31.12.2019. If all or certain articles of the policy are renewed, the effective date of the policy will be updated. On the website of our policy company (www.harstraktor.com) is published and made available to interested parties at the request of personal data owners.

**SECTION 2 - PERSONAL DATA PROTECTION CONSIDERATIONS**

**2.1. Ensuring the security of personal data**

Our Company, Act 12. in accordance with its article, it takes the necessary measures according to the nature of the data to be protected in order to prevent the unlawful disclosure, access, transfer or other security deficiencies that may occur. In this context, our company takes administrative measures to ensure the necessary level of security in accordance with the guidelines published by the Personal Data Protection Board (Board), conducts audits or conducts them.

**2.2. Protection of personal data of special nature**

Personal data that is sensitive has been given special attention under the law due to the risk of victimization or discrimination of persons when it is illegally processed. This “special” personal information, such as race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, costume and dress, Association or trade union membership, health, sexual life, criminal convictions and security measures with biometric data and genetic data.

In this context, the technical and administrative measures taken by our company for the protection of personal data are applied carefully in terms of special quality personal data and the necessary audits are provided within our company.

3.3 of this policy to provide detailed information on the processing of special-quality personal data. section are included.

**2.3.** **Increase and control of business units awareness of the protection and processing of personal data**

Our company provides the necessary training in business units in order to increase awareness in order to ensure the unlawful processing of personal data, the Prevention of unlawful access to data and the preservation of data.

Our company creates the necessary systems for the formation of awareness of the personal data protection of existing employees and employees who have just joined its structure, and works with consultants if necessary on this issue. Accordingly, our company evaluates the participation in related trainings, seminars and information sessions and organizes new trainings in parallel with the update of the relevant legislation.

**SECTION 3 - CONSIDERATIONS FOR PROCESSING PERSONAL DATA**

**3.1. Processing of personal data in accordance with the principles stipulated in the legislation**

**3.1.1. Processing in accordance with the law and the rule of honesty**

Personal data is processed in accordance with the general rule of trust and honesty in such a way that it does not harm the fundamental rights and freedoms of persons. In this context, personal data is processed to the extent and limited to the extent required by our company's business activities.

**3.1.2. Ensuring that personal data is accurate and up-to-date when necessary**

Our company takes the necessary measures to ensure that personal data is accurate and up-to-date during the processing period and establishes the necessary mechanisms to ensure the accuracy and timeliness of personal data for certain periods of time.

**3.1.3. Processing for specific, explicit and legitimate purposes**

Our company clearly sets out the purposes for processing personal data and processes it within the scope of the purposes related to these activities in line with its business activities.

**3.1.4. Be linked, Limited and measured to the purpose for which they are processed**

Our company collects personal data only to the extent and nature required by business activities and processes it limited for the specified purposes.

**3.1.5. Retention for the period stipulated in the relevant legislation or required for the purpose for which they are processed**

Our company retains personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the relevant legislation. In this context, our company first determines whether a period is stipulated for the storage of personal data in the relevant legislation and acts in accordance with this period if a period is determined. If a legal period is not available, personal data is stored for the period required for the purpose for which they are processed. Personal data is destroyed at the end of the specified retention periods in accordance with the periodic destruction periods or the data owner's application and by the specified destruction methods (deletion and/or destruction and/or anonymization).

**3.2. Terms of processing of personal data**

Except for the express consent of the personal data owner, the basis of the personal data processing activity may be only one of the following conditions, and more than one condition may be the basis of the same personal data processing activity. If the processed data is personal data of a special nature, the conditions contained in title 3.3 of this policy (“processing of personal data of a special nature”) will apply.

1. **Having the explicit consent of the personal data owner**

One of the conditions for processing personal data is the explicit consent of the data owner. The explicit consent of the owner of personal data must be disclosed on a specific issue, based on information and of free will.

Personal data may be processed without the explicit consent of the data owner in case of the existence of the following personal data processing conditions.

1. **Clearly stipulated in the law**

If the personal data of the data owner is clearly provided for in the law, in other words, the existence of this data processing requirement may be mentioned if there is a clear provision in the relevant law regarding the processing of personal data.

1. **Inability to obtain explicit consent of the person concerned due to actual impossibility**

If the processing of personal data of a person who cannot disclose his consent due to actual impossibility or whose consent cannot be granted validity is mandatory to protect the life or body integrity of himself or another person, the personal data of the data owner may be processed.

**(iv) Direct interest in the establishment or execution of the contract**

Provided that it is directly related to the establishment or execution of a contract to which the data subject is a party, this condition may be considered fulfilled if the processing of personal data is necessary.

1. **Fulfilling the company's legal obligation**

If processing is mandatory for our company to fulfill its legal obligations, the personal data of the data owner may be processed.

1. **Disclosure Of Personal Data Of The Personal Data Owner**

If the data owner has publicly disclosed his personal data, the relevant personal data may be processed for limited purposes.

1. **Data Processing is mandatory for the establishment or protection of a right**

If data processing is mandatory for the establishment, use or protection of a right, the personal data of the data owner may be processed.

1. **Data Processing is mandatory for the legitimate interest of our company**

Personal data of the data owner may be processed if data processing is mandatory for the legitimate interests of our company, provided that it does not damage the fundamental rights and freedoms of the personal data owner.

**3.3. Processing of specially qualified personal data**

Special personal data are qualified by our company, in accordance with the principles in this policy and by taking all necessary administrative and technical measures, including methods to be determined by the board and are processed in the presence of the following terms:

1. **Special qualified personal data other than health and sex life,** if there is a clear provision in the law regarding the processing of personal data, it may be processed without the explicit consent of the data owner. Otherwise, the explicit consent of the data owner will be obtained.
2. **Specially qualified personal data relating to health and sex life**

Public Health Protection, preventive medicine, medical diagnosis, treatment and care in the execution of services, for the purposes of financing the planning and management of Health Services, under the obligation of confidentiality by authorized persons or institutions without requiring explicit consent can be processed. Otherwise, the explicit consent of the data owner will be obtained.

**3.4. DISCLOSURE OF PERSONAL DATA OWNER**

Our Company, Act 10. in accordance with its article and the decisions of the board, it informs the owners of personal data about who is responsible for the data, for what purposes their personal data is processed, for what purposes it is shared with whom, by what methods it is collected and the legal reason and the rights of the data owners within the scope of the processing of their personal data.

**3.5. TRANSFER OF PERSONAL DATA**

Our company is in compliance with the law processing personal data for the purposes of taking the necessary safety precautions the holder of personal data and private personal data of personal data by qualified third parties (third party companies, business partners, Third-real persons) transfer. Our company in this direction 8 of the law. it acts in accordance with the regulations stipulated in the article. Detailed information about this issue can be obtained *from the document of third parties and the purposes for which this policy is transferred personal data by our company.*

**3.5. Transfer of personal data**

If one or more of the following conditions exist, even without the express consent of the personal data owner, personal data may be transferred to third parties by taking the necessary care by our company and taking all necessary security measures, including the methods prescribed by the board.

* Clearly foresee the relevant activities related to the transfer of personal data in the law,
* The transfer of personal data by the company is directly related and necessary to the establishment or execution of a contract,
* The transfer of personal data is mandatory for our company to fulfill its legal obligation,
* Transfer of personal data by our company in a limited manner for the purpose of publicization, provided that the data owner has been publicly disclosed,
* The transfer of personal data by the company is mandatory for the establishment, use or protection of the rights of the company or the data owner or third parties,
* It is mandatory to carry out personal data transfer activities for the legitimate interests of the company, provided that they do not harm the fundamental rights and freedoms of the data owner,
* A person who cannot disclose his consent due to actual impossibility, or whose consent is not granted legal validity, is required to protect the life or body integrity of himself or someone else.

In addition to the above, personal data may be transferred to foreign countries declared by the board to have adequate protection (“foreign country with adequate protection”) in the presence of any of the above conditions. In the absence of adequate protection, it may be transferred to foreign countries (“foreign country where there is a data controller committed to adequate protection”) where the data controllers in Turkey and the relevant foreign country undertake adequate protection in writing and have the permission of the board in accordance with the data transfer conditions stipulated in the legislation.

**3.5.2. Transfer Of Special Qualified Personal Data**

Special qualified personal data in our company's UHD is in routine operation it is not transferred to 3rd persons.

In the case of the transfer of personal data of a private nature, by the company, in accordance with the principles in this policy and by taking all necessary administrative and technical measures, **including methods to be determined by the board and may be transferred only in the presence of the following conditions:**

1. **Special qualified personal data other than health and sex life**, if there is a clear provision in the law regarding the processing of personal data, it may be processed without the explicit consent of the data owner. Otherwise, the explicit consent of the data owner will be obtained.
2. **Special Health and sexual life, personal data public health protection**, preventive medicine, medical diagnosis, preventive medicine, medical diagnosis, treatment and care in the execution of services, for the purposes of financing the planning and management of Health Services, under the obligation of confidentiality by authorized persons or institutions without requiring explicit consent can be processed. Otherwise, the explicit consent of the data owner will be obtained.

In addition to the above, **personal data may be transferred to a foreign country** with sufficient protection if any of the above conditions exist. In the absence of adequate protection, in accordance with the data transfer conditions stipulated in the legislation, the data controllers in Turkey and the relevant foreign country undertake adequate protection in writing and the data controller who undertakes adequate protection may be transferred to the foreign country.

**4. SECTION 4 - CATEGORIZATION AND PROCESSING PURPOSES OF PERSONAL DATA PROCESSED BY OUR COMPANY**

Before our Company, Act 10. Article, Board decisions and other legislation in accordance with the relevant persons informed , For the purposes of our company's personal data processing, Act 5. and 6. based on at least one of the personal data processing conditions specified in the article and limited , 4 of the law on the processing of personal data in the first place. personal data is processed in accordance with the general principles set out in the law, including the principles set out in the article. In accordance with the purposes and conditions set out in this policy, detailed information about the categories of personal data processed and the categories will be available from the policy's Personal Data categories document. Detailed information about such personal data processing purposes is included in the ***personal data processing purposes*** section of the policy. .

**5. SECTION 5 - STORAGE AND DISPOSAL OF PERSONAL DATA**

Our company retains personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the relevant legislation. In this context, our company first determines whether a period is stipulated for the storage of personal data in the relevant legislation and acts in accordance with this period if a period is determined. If a legal period is not available, personal data is stored for the period required for the purpose for which they are processed. Personal data is destroyed at the end of the specified retention periods in accordance with the periodic destruction periods or the data owner's application and by the specified destruction methods (deletion and/or destruction and/or anonymization).

**6. SECTION 6 - RIGHTS OF PERSONAL DATA OWNERS AND EXERCISE OF THESE RIGHTS**

6.1. RIGHTS OF THE PERSONAL DATA OWNER

Personal data owners have the following rights:

1. Learning whether personal data has been processed,
2. Request information about personal data if it has been processed,
3. Learning the purpose of processing personal data and whether it is used for its purpose,
4. Knowledge of third parties with whom personal data is transferred at home or abroad,
5. Request that personal data be corrected if it is incomplete or incorrectly processed, and request that the transaction made in this context be notified to third parties where the personal data is transferred,
6. Processed in accordance with the provisions of this law and other relevant laws, although in the case of the disappearance of the reasons that require the processing of personal data and, in this context the deletion or destruction of the process request to be notified of the personal data transferred to third parties,
7. Objecting to the occurrence of a result against the person himself by analyzing the processed data exclusively through automated systems,
8. Request the removal of damages in case of damage due to unlawful processing of personal data.

**6.2. EXERCISE OF THE RIGHTS OF THE PERSONAL DATA OWNER**

Section 6.1 of personal data owners.(the“personal data of the owner of rights”) and rights determined by the board of the company the methods that are counted as demands for the protection of personal data and processing of data as stated in the policy as written and signed electronically signed with secure electronic signature wet as the principal to address the above-mentioned registered electronic e-mail sent to our address or info@harstraktor.com in the case of sending applications as soon as possible and no later than 30 (thirty) days will be evaluated.

In this direction, personal data owners can submit an application form http://www.harstraktor.com the data owner can use the application form, which can be accessed at the address.

**6.3. OUR COMPANY RESPONDS TO APPLICATIONS**

Our company takes the necessary administrative and technical measures to finalize the applications to be made by the personal data owner in accordance with the legislation.

Personal data owner, section 6.1.if it duly submits its request for the rights contained in the“rights of the personal data owner” to our company, our company will conclude the request free of charge as soon as possible and no later than 30 (thirty) days, depending on the nature of the request. However, if the transaction also requires a cost, a fee may be charged in accordance with the tariff set by the board.

**Doc. 1 – Purposes of Personal Data Processing**

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| **MAIN PURPOSES (PRIMARY)** | **SUB-PURPOSES (SECONDARY** |
| Planning and execution of the company's human resources policies and processes | Planning human resources processes |
| Execution of personnel procurement processes |
| Planning and execution of trainee and student procurement placement and operation processes |
| **Carrying out the necessary work by our related business units for the realization of commercial activities carried out by the company and carrying out the related business processes** | Event management |

|  |  |
| --- | --- |
| **Conducting the necessary work by our business units to benefit the relevant people from the products and services offered by the company and conducting the relevant business processes** | Event management |
| Planning and execution of business activities |
| Planning and execution of supply chain management processes |
| Planning and execution of information access authorizations of business partners and suppliers |
| Follow-up of Finance and accounting works |
| Planning and execution of purchasing processes |
| Planning and execution of corporate communication activities |
| Planning and execution of corporate governance activities |
| Planning and execution of production and operation processes |
| Implementation of efficiency and performance analysis of business activities planning and execution of activities |
| Planning audit and execution of information security processes |
| Planning and execution of corporate sustainability activities |
| Planning and execution of logistics activities |
| Planning and execution of business continuity activities |
| Creating and managing information technology infrastructure |
| Planning and execution of Social Responsibility and civil society activities |
| **Conducting the necessary work by our business units to benefit the relevant people from the products and services offered by the company and conducting the relevant business processes** | Planning and execution of After Sales Support Services activities |
| Monitoring of contract processes and legal claims |
| Follow-up of customer requests and complaints |
| Planning and execution of customer relationship management processes |
| Managing relationships with partners and suppliers |
| Planning and execution of sales processes of products and services |
| **Planning and execution of the company's commercial and business strategies** | Planning and execution of non-company training activities |
| Execution of strategic planning activities |
| Managing relationships with partners and suppliers |
| **The products and services offered by the company are customized according to the likes and needs of the people concerned and recommended to the people concerned and the planning and execution of the activities necessary for the promotion of the company** | Planning and execution of marketing processes of products and services |
| Identification and evaluation of people who will be subject to marketing activities in accordance with consumer behavior criteria |
| Planning and executing activities to improve and improve user experience in relation to products and services |
| Design and execution of personalized marketing and promotional activities |
| Planning and execution of the company's production and operational risk processes |
| Design and execution of advertising and promotion and marketing activities in digital and other media |
| Planning and execution of data analytics studies for marketing purposes |
| Planning and execution of customer satisfaction activities |
| On customer acquisition in digital and other media and value creation in existing customers  design and execution of activities to be developed |
| Planning and executing Sunday research activities for sales and marketing of products and services |
| Planning and execution of activities for brand communication and reputation |
| Planning and executing processes to create and increase commitment to the products and services offered by the company |
| Planning and execution of business continuity activities |
| **Ensuring legal, technical and commercial-business security of the company and related persons in business relations with the company** | Creation and tracking of visitor records |
| Planning and execution of the operational activities necessary to ensure the execution of the company's activities in accordance with the company's procedures and relevant legislation |
| Ensuring the security of the company's operations |
| Ensuring that data is accurate and up-to-date |
| Planning and execution of the company's financial risk processes |
| Planning and execution of company audit activities |
| Providing information arising from legislation to Authorized Organizations |
| Monitoring of legal affairs |
| Ensuring the security of company settlements and facilities |
| Planning and execution of Occupational Health and safety processes |
| Planning and execution of business continuity activities |
| Ensuring, supervising and executing the security of the company's fixtures and resources |
| Acil durum yönetimi süreçlerinin planlanması ve yürütülmesi |

**DOC 2-Personal Data owners**

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| **PERSONAL DATA OWNER**  **Categories** | **Description** |
| **Customer** | Individuals who use or have used the products and services offered by our company, regardless of whether they have any contractual relationship with our company |
| **Potential Customer** | Natural persons who have requested or interested in using our products and services or who have been assessed in accordance with the rules of commercial practice and honesty in which they may have this interest |
| **Visiting** | Individuals who have entered the physical settlements owned by our company for various purposes or have visited our websites |
| **Third Person** | In order to ensure the security of our company's commercial transactions between the above parties or to protect and benefit the rights of such persons, third-party natural persons associated with such persons (for example, guarantor, family members and relatives) or other natural persons not covered by this Personal Data Protection and Processing Policy |
| **Running Candidate** | Individuals who have applied for a job in any way to our company or who have opened their resume and related information to our company's review |
| **Company Shareholder** | Shareholders of our company are real persons |
| **Company Official** | Members of the board of Directors of our company and other authorized real persons |
| **We are within the business community**  **Employees Of Institutions,**  **Shareholders and officials** | Individuals, including shareholders and officials of these institutions, who work in institutions with which our company has all kinds of business relationships (such as, but not limited to, business partners, dealers, authorized services, suppliers) |

**Doc 3-categories of personal data**

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| **PERSONAL DATA OWNER**  **Categories** | **Description** |
| **Credential** | Data containing information about the identity of the person: first name-last name, T.C. identity number such as driver's License, ID card and passport containing information such as identification number, nationality information, mother's name-father's name, place of birth, date of birth, gender, as well as tax number, SGK number, vehicle license plate, etc.b. data |
| **Contact Information** | Phone number, address, email, fax number |
| **Location Data** | Information that determines the location of the personal data owner's location during the use of our products and services or when the employees of the institutions in which we cooperate with our employees are using our company's tools |
| **Customer Information** | Information obtained and produced about the person concerned as a result of our business activities and the operations carried out by our business units within this framework |
| **Family members and relatives**  **Information** | Information about family members and relatives of the personal data owner within the framework of our company's operations and related to the products and services we offer or in order to protect the legal and other interests of the company and the data owner |
| **Customer Transaction Information** | Information such as records of the use of our products and services and instructions and requests of the customer for the use of the products and services, which are clearly owned by a certain or identifiable natural person and are contained in the data recording system |
| **Physical Space Security**  **Information** | Personal data related to records and documents taken at the entrance to the physical place, during the stay in the physical place; camera records, fingerprint records and records taken at the security point, etc. |
| **Transaction Security Information** | Your personal data (e.g. log records) that are processed to ensure our technical, administrative, legal and commercial security when we conduct our business activities) |
| **Risk Management Information** | Personal data processed through methods used in these areas in accordance with generally accepted legal, commercial practice and honesty rules in order to manage our commercial, technical and administrative risks |
| **Financial Information** | ID open a specific or identifiable natural person that belongs to a partially or a completely automatic way, as part of the data recording system or non-automatic in a way are processed; personal data established according to the type of legal relationship with the owner of the company created all kinds of financial information indicating the result, documents and records in relation to processed personal data and bank account number, IBAN number, credit card information, financial profile, assets, data, data such as income information |
| **Concise Knowledge** | Any personal data processed to obtain information that will be the basis for the formation of personal rights of individuals who are in a working relationship with our company |
| **Employee Candidate Information** | Personal data processed related to individuals who have applied to become an employee of our company or who have been evaluated as an employee candidate in accordance with the human resources needs of our company in accordance with the rules of commercial practice and honesty or who are in a working relationship with our company |
| **Special Qualified Personal Data** | Persons race, ethnic origin, political opinion, philosophical belief, religion and sect, or other beliefs, costume and dress, Association or trade union membership, health, sexual life, criminal convictions and security measures with biometric data and genetic data. |
| **Marketing Information** | Personal data processed to customize and market our products and services in accordance with the usage habits, tastes and needs of the personal data owner, and reports and evaluations created as a result of this processing. |
| **Demand / Complaint Management**  **Information** | Personal data regarding the receipt and evaluation of any requests or complaints made to our company |
| **Audiovisual Data** | Data contained in documents that are clearly belonging to a certain or identifiable natural person; photos and camera recordings (except recordings that are included within the scope of physical location security information), audio recordings and copies of documents containing personal data |
| **Inspection and inspection information** | It means personal data processed during internal or external audit activities within the scope of our company's legal obligations and compliance with company policies. |
| **Legal action and compliance** | Personal data processed in accordance with the determination, follow-up and performance of our legal receivables and rights, as well as our legal obligations and compliance with our company's policies. |

**Doc 4 – third parties to which personal data is transferred by our company and the purposes of transfer**

8 Of The Code Of Our Company. and 9. in accordance with their articles, customers ' personal data can be transferred to the categories of people listed below

1. Business partner
2. Persons of private law authorized by law
3. legally authorized public institutions and organizations

The scope and purposes of data transfer of the aforementioned persons are stated below.

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| --- | --- | --- |
| **Data Transfer Can Be Done**  **People** | **Definition** | **Purpose Of Data Transfer** |
| **Business Partner** | Dealers with whom we cooperate to sell our company's products or services in a specific region and perform other transactions (to our company's dealers  http://www.harstraktor.com/tr/  you will find the list at the address below. ) | In order to ensure that the establishment objectives of the business partnership are met, |
| **Supplier** | Parties providing services to our company in accordance with the purposes and instructions of our company's data processing within the scope of the conduct of our company's commercial activities | Ensuring that services outsourced by our company from the supplier and necessary to fulfill our company's commercial activities are provided to our company  limited in purpose. |
| **Legally authorized public institutions and organizations** | Public institutions and organizations authorized to receive information and documents from our company in accordance with the provisions of the relevant legislation. | Legal of relevant public institutions and organizations |
|  | For example, the Competition Board | limited to the purpose requested within its jurisdiction |
| **Legally Authorized Private Law**  **Contacts** | It means institutions or organizations (for example, banks, independent auditors) that have been established in accordance with certain conditions established by law in accordance with the provisions of the relevant legislation and continue their activities within the framework determined by the law. | Personal data is shared on a limited basis in relation to issues that are included in the activities carried out by the relevant private institutions and organizations. |