

 SULTAN Gıda San. ve Tic. A.Ş.	LAW ON THE PROTECTION OF PERSONAL DATA CLARIFICATION TEXT AND PRIVACY POLICY	Document No	GP.DD.001
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In accordance with the Personal Data Protection Law No. 6698 (hereinafter referred to as "PDPL" or "Law"), it is important to process and preserve personal data and / or sensitive personal data. For this reason, as **SULTAN GIDA SANAYİ VE TİCARET A.Ş** (hereinafter referred to as "**SULTAN GIDA**" or "**Company**"), we act in accordance with the PDPL regarding the protection, preservation and processing of your personal data and / or sensitive personal data.

We frequently receive data from you on the internet. Personal data and/or sensitive personal data received and recorded during the visit of our website are processed in accordance with the Personal Data Protection Law. In this context, SULTAN GIDA receives and maintains your data within the legal limits as the data controller. We would also like to state that; all personal data and / or sensitive personal data received during the visit of our website are protected within the framework of our Privacy Policy. In this regard, you can review our Privacy Policy, which you can find on our page, and the PDPL clarification text of our website from the link <https://www.sultangidasan.com>.

This clarification text has been prepared by **SULTAN GIDA** in the capacity of data controller within the scope of Article 10 of the Personal Data Protection Law No. 6698 and the Communiqué on the Procedures and Principles to be Followed in Fulfilling the Obligation To Inform.

1-WHAT IS PERSONAL DATA?

Personal data is defined as "Any information relating to an identified or identifiable natural person" in the Law No. 6698 on the Protection of Personal Data. As can be understood from the definition, any information that makes you identifiable is personal data. In addition to all these, political opinion, sect, race, religion, association-foundation membership, health information, philosophical thought, belief, sexual preference, criminal record, criminal conviction information, biometric data are personal data of a special nature.

2-LEGAL BASIS

The Personal Data Protection Law No. 6698 stipulates that the persons whose data are processed must be informed before data processing activities are carried out. This issue, which is considered as the Obligation to Inform, is stipulated in Article 10 of the Personal Data Protection Law as follows: "During the acquisition of personal data, the data controller and the person authorized by the data controller are obliged to inform the relevant persons about the identity of the data controller and its representative, if any, for what purpose the personal data will be processed, to whom and for what purpose the processed personal data can be transferred, the method and legal reason for collecting personal data, and other rights listed in Article 11." In Article 3 of this Law, the data controller is defined as "Natural or legal persons who determine the purposes and means of processing personal data and are responsible for the establishment and management of the data recording system".

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Again, the data processor is defined as "the natural or legal person who processes personal data on behalf of the data controller based on the authorization granted by the data controller." In this context, the data controller is Sultan Gıda, whose website you have visited. The information of the data controller is as follows.

Data Controller : SULTAN GIDA SANAYİ VE TİCARET A.Ş.

Address : Fatih Mahallesi Sazkovan Küme evler Dış Kapı No : 5/2 İç kapı no:2 Kınık / İzmir

Tel : +90 232 687 13 27 (3 lines)

E-mail : sultangida@sultangidasan.com.tr

3- SCOPE OF THE OBLIGATION TO INFORM OF THE DATA CONTROLLER SULTAN GIDA

In accordance with the foregoing, the data controller is **SULTAN GIDA**. Under the title of data controller, **SULTAN GIDA** informs and enlightens you in this Clarification Text about the purpose for which personal data can be processed by whom and for what purpose, to whom and for what purpose it can be transferred, the method and legal reason for collecting data and the rights of the data owner for the protection of personal data.

4- PURPOSES OF PROCESSING YOUR DATA BY SULTAN GIDA

Your personal data is processed within the limits stipulated by the Personal Data Protection Law No. 6698 and based on the principles of the law.

Within the framework of the law, our data processing purposes as **SULTAN GIDA** are as follows;

- ✓ Increasing the quality of products and services offered to you,
- ✓ **SULTAN GIDA** can quickly inform you about the innovations, products and services offered,
- ✓ Determining personalized needs and purposes of use, and in this context, realizing the provision of goods and services tailored to our customers,
- ✓ **SULTAN GIDA**'s commercial activity to be carried out and in this context, providing you with complete performance,
- ✓ Informing you about our changing and developing products and services and clarifying when necessary,
- ✓ Ensuring that you benefit from the products and services offered by our company in the best possible way,

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- ✓ As **SULTAN GIDA**, being able to develop and determine our commercial partnerships and strategies, establishing them on a secure basis, making the right decisions in our commercial policies and managerial functioning,
- ✓ As **SULTAN GIDA**, establishing our corporate identity on a solid foundation and ensuring corporate functioning,
- ✓ Achieving the targets of our internal policies and thus increasing the satisfaction of our customers,
- ✓ Ensuring information security,
- ✓ As **SULTAN GIDA**, improving the goods and services offered over the internet,
- ✓ Quickly resolving the problems experienced,
- ✓ Contacting those who submit requests and complaints to **SULTAN GIDA**,
- ✓ Ensuring compliance with the provisions of the Privacy Policy on our website, which you can access via the link <https://www.sultangidasan.com>.

5-PRINCIPLES FOR THE PROCESSING OF YOUR DATA

- a. As **SULTAN GIDA**, we have adopted the principle of preserving your data for the period stipulated in the relevant legislation or required for the purpose for which they are processed;
- b. Processing it in accordance with the law;
- c. Ensuring that it is up to date;
- d. Acting in accordance with the rules of honesty;
- e. Not using it for purposes other than the purpose for which it is processed;
- f. Being moderate and limited to the purpose for which it is processed;
- g. Processing it in accordance with general morality, customs and traditions;
- h. Processing it in accordance with the provisions of all relevant legislation, especially the provisions of the Personal Data Protection Law No. 6698.

6-DATA PROCESSING PROCEDURE

Your personal data can be processed by **SULTAN GIDA** in the case of two situations.

These two situations are as follows:

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➤ EXPRESS CONSENT**➤ CASES OF COMPLIANCE WITH THE LAW (CASES WHERE EXPLICIT CONSENT IS NOT****REQUIRED) CASES WHERE EXPLICIT CONSENT IS NOT REQUIRED**

The Personal Data Protection Law No. 6698 states that in some cases, explicit consent is not required for the processing of personal data.

These cases specified in paragraph 2 of Article 5 of the Law are as follows:

- ✓ It is clearly stipulated in the laws.
- ✓ It is mandatory for the protection of the life or physical integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid.
- ✓ It is necessary to process personal data belonging to the parties to a contract, provided that it is directly related to the establishment or performance of a contract.

It is mandatory for the data controller to fulfill its legal obligation.

- ✓ It has been made public by the data subject himself/herself.
- ✓ Data processing is mandatory for the establishment, exercise or protection of a right.
- ✓ Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.
- ✓ In the presence of such situations, we have the right to process data as **SULTAN GIDA** without your explicit consent.

We have the right to process personal data other than health and sexual life from your sensitive personal data without seeking explicit consent in cases stipulated by law. Personal data related to health and sexual life can only be processed by persons or authorized institutions and organizations under the obligation of confidentiality for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, without seeking the explicit consent of the person concerned.

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7- THE METHOD AND LEGAL REASON FOR COLLECTING YOUR DATA

In developing and changing technological conditions, our company collects data from different channels. The website is one of the areas where we collect personal data automatically. Personal data and/or private personal data collected through the website within **SULTAN GIDA** are processed based on one or more of the legal reasons in Articles 5 and 6 of Law No. 6698 or on the condition of explicit consent. We would like to state that the relevant person is informed according to the category and type of the processed data, the purpose for which the data will be processed, to whom and for what purpose the processed data can be transferred, the method and legal reason for data collection and the rights of the person concerned are explained in the said clarification texts and explicit consent is obtained when necessary.

8- TRANSFER AND PROTECTION OF DATA**a- TRANSFER**

Your data is transferred to third parties when necessary in accordance with the Personal Data Protection Law No. 6698, in accordance with the conditions in our confidentiality agreements. For each transferred data, a detailed explanation is made in the Clarification Text made before the data is obtained for the purpose to whom the data can be transferred. However, under all circumstances, **SULTAN GIDA** acts in accordance with Articles 8 and 9 of Law No. 6698 when transferring data. In addition, it takes the necessary technical and administrative measures.

b- PROTECTION

The Personal Data Protection Law No. 6698 mainly aims to protect data and prevent unauthorized transfer. As **SULTAN GIDA**, we take the necessary technical and administrative measures to prevent the transfer of data to unauthorized third parties, especially the provisions of the relevant law. In this context, we especially make our internal policies in accordance with the Personal Data Protection Law and we have all kinds of technical software and hardware for the protection of personal data. In order to ensure all these, we try to prevent both our employees within the company and the third parties we do business with from violating our Privacy Policy, which you can access from the link <https://www.sultangidasan.com>.

9-RIGHTS OF THE RELEVANT DATA SUBJECT**a-GENERAL INFORMATION ABOUT THE APPLICATION**

Article 11 of the Personal Data Protection Law No. 6698 stipulates the rights of the data subject. In the Law, the data subject is considered as "*relevant person*" and the right to make certain requests regarding the processing of his/her data is stipulated.

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The rights of the relevant person pursuant to this Article are as follows:

- a. To learn whether personal data is processed or not,
- b. To request information if his/her personal data has been processed,
- c. To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- d. To know the third parties to whom personal data are transferred domestically or abroad,
- e. To request correction of personal data in case of incomplete or incorrect processing,
- f. To request the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of the Law titled "Deletion, destruction or anonymization of personal data",
- g. To request notification to third parties to whom personal data is transferred that incomplete or incorrectly processed data has been corrected or that the data has been deleted or destroyed upon the request of the data subject
- h. To object to the emergence of a result to the detriment of the person himself/herself by analyzing the processed data exclusively through automated systems,
- i. In case of damage due to unlawful processing of personal data, to demand compensation for the damage.
- j. You can submit your requests regarding your rights arising from the Personal Data Protection Law explained above to our company within the framework of the procedure specified in this Clarification Text. Your requests in question will be answered by **SULTAN GIDA** as soon as possible or within thirty days at the latest. Applications must be made by the data subject himself/herself. **SULTAN GIDA** will only consider the application made by the data subject and share information about the applicant.

b- APPLICATION PROCEDURE

You can send your requests to **SULTAN GIDA**, which acts as the data controller, regarding your rights mentioned above, in writing or by using the registered electronic mail (KEP) address, secure electronic signature, mobile signature or the electronic mail address previously notified to the data controller by the data subject and registered in the system of the data controller.

c-INFORMATION REQUIRED IN THE APPLICATION

The information required in your application is as follows:

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- ✓ Your Name and Surname
- ✓ Your T.R. Identity Number
- ✓ If you are a Foreign National, your Nationality, Passport Number or Identity Number, if any
- ✓ If a Written Application is to be made, Your Original Signature at the Bottom of the Request Form
- ✓ Content of your Request pursuant to Article 11 of PDPL
- ✓ Your E-Mail Address Where We Can Contact You
- ✓ Residential or Workplace Address for Notification

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