

INFORMATION LETTER ON THE PERSONAL DATA PROCESSING

Controller: Klimasan Klima San. ve Tic. A.Ş. (“**Company**”)
Manisa OSB 1. Kısım Keçiliköy OSB Mahallesi Cumhuriyet Caddesi No:1
45030 Yunusemre / MANİSA – Türkiye

Our Company, is committed to comply with all applicable legislation relating to the processing of personal data and aims to ensure it’s implementation, especially, Constitution of Turkey No.2709 (“**Constitution**”), Personal Data Protection Law No. 6698 (“**PDPL**”), Turkish Penal Code No. 5237 (“**TPC**”), by setting forth the basic principles.

Our Company, pursuant to the Article 10 of the Law on the Protection of Personal Data, aims to inform you about the scope and conditions under which the personal data shared by you with the title of customer, supplier or employee is processed by our Company.

Your personal data is processed by the Company within the scope and conditions described in this Information Letter on Personal Data Processing and within the legal limits.

I. Controller and his Representative

Your personal data is processed by our Company with the title of “controller” as defined in the Article 3 of Law on the Protection of Personal Data.

II. Legal Basis

Your personal data is processed by the Company in accordance with the provisions in the legislation concerning the processing of personal data and Constitution of Turkey No. 2709, Personal Data Protection Law No. 6698, Turkish Penal Code No.5237.

III. General Principles in Processing Personal Data

Your personal data is processed by our Company in accordance with the following general principles in accordance with the purpose of the Personal Data Protection Law:

1. Lawfulness and conformity with rules of bona fides
2. Accuracy and being up to date
3. Being processed for specific, explicit and legitimate purposes
4. Being relevant with, limited to and proportionate to the purposes for which they are processed
5. Being retained for the period of time stipulated by relevant legislation or the purpose for which they are processed

IV. The Purposes of Processing Personal Data

Your personal data may be processed by our Company in accordance with the purpose of the Personal Data Protection Law, the general principles set out in the Personal Data Protection Law and the processing conditions of the personal data set out in Articles 5 and 6 of the Personal Data Protection Law, for the purposes including but not limited to:

- Execution and management of Our Company's legal compliance processes;
- Determination, planning and implementation of our company's short, medium and long term commercial policies and business strategies;
- Fulfillment of the commercial activities (including production R&D, marketing, sales, distribution, service activities) carried out by our Company in accordance with the legislation related to the principles and policies of our Company and carrying out necessary studies in this context;
- Execution and management of administrative operations and activities carried out by our Company;
- Making sufficient use of the products and services offered by our Company and carrying out the necessary studies in this context;
- Offering products and services which are customized according to customers' tastes, usage habits and needs;
- Protecting our Company's business reputation and trust in the community;
- Arrangement of records and documents constituting a basis for the transactions and the operations of our Company;
- Ensuring commercial and legal security of our Company and real persons who are directly or indirectly in business / commercial relationship with our Company;
- Confirmation and registration of identity / address and other information of real persons who are directly or indirectly in business / commercial relationship with our Company;
- Being able to evaluate the questions, opinions and suggestions of real persons who are directly or indirectly in business / commercial relationship with our company, drawing up satisfaction surveys, carrying out and managing the evaluation / complaint management and reputation research processes;
- Fulfillment of our Company's reporting and other obligations stipulated by the laws and regulations to which our Company and its subsidiaries and affiliates are subject;
- Fulfillment of our Company's obligations and exercising its rights under the Personal Data Protection Law

The personal data of our employees may be processed by our Company or the legal or real persons which are authorized by or in cooperation with our Company for operational reasons such as the design, planning, implementation of human resources activities or increasing performance level and employee satisfaction and ensuring occupational safety and work peace within our human resources policy in addition to the requirements of the Labor Law and the labor and social security legislation and the other legislation in force.

V. The Method and Legal Reason of Collection of Personal Data

Your personal data is collected in verbal, written or visual form by our Company in accordance with the purpose of Personal Data Protection Law and general principles set forth therein and under the personal data processing conditions provided in the Article 5 and 6 of Personal Data Protection Law, for the purposes set out in the section IV of this information letter, based on various contractual and legal reasons which are different with respect to each business / business relationship established with our Company, through fully or partially automatic means or through non-automatic means provided that the process is a part of any data registry system, by means such as our Company's web sites, call centers, other electronic communication tools, various contracts, mobile applications, electronic mail, application forms and other instruments and media for recording and transmitting signals, sounds and / or images and via trainings, seminars and organizations organized by our Company.

VI. Transfer of Personal Data

Your personal data may be transferred by our Company to, our Company's existing / former controlling companies and affiliates, subsidiaries, branches, business partners, shareholders, managers, representatives, employees, consultants (including legal and financial advisors), suppliers, dealers, subcontractors, assistants, successors, predecessors in country or abroad; to those who carry out or are involved in the commercial activities of our Company regardless of whether or not there is a contract between them and our Company (including the persons providing data storage in the cloud service, service for sending commercial electronic messages, survey service and quality control service); to the persons with whom the Company has any other relationship; to the persons who have an administrative, capital and contractual organic relationship with the Company; to the publicly authorized public institutions (including courts and ministries) and to other private persons in accordance with the purpose of Personal Data Protection Law and general principles set forth therein and under the personal data processing conditions provided in the Article 8 and 9 of Personal Data Protection Law, for the purposes set out in the section IV of this information letter.

VII. Destruction of Personal Data

Your personal data is to be processed for the periods required by the personal data processing purposes set out in this Information Letter on Personal Data Processing unless a longer periods of time is stipulated in the contract between you and our Company and / or in relevant legislation and at the end of these periods, your personal data will be immediately erased, destroyed or anonymized.

VIII. Your Rights set out in the Article 11 of Personal Data Protection Law as Data Subject

In accordance with the Personal Data Protection Law and other legislation in force, you have rights;

1. to learn whether your personal data are processed or not,
2. to request information if your personal data are processed,

3. to learn the purpose of your data processing and whether this data is used for intended purposes,
4. to know the third parties to whom your personal data is transferred at home or abroad,
5. to request the rectification of the incomplete or inaccurate data, if any,
6. to request the erasure or destruction of your personal data under the conditions laid down in Personal Data Protection Law and related regulations ,
7. to request notification of the ratification of your incomplete or inaccurate data; or the erasure or destruction of your personal data to third parties to whom your personal data has been transferred,
8. to object to the processing of your personal data exclusively by automatic means, which leads to an unfavorable consequence for you,
9. to request compensation for the damage arisen from the unlawful processing of your personal data.

IX. Application Method

In the light of the information above, you may apply to the Company by registered mail with return receipt to be sent to the Company's commercial center located in Manisa OSB 1. Kısım Keçiliköy OSB Mah. Cumhuriyet Cad. No: 1 45030 Yunusemre / Manisa or a form submitted in person.

X. Application Process and Its Termination

Our Company concludes your applications within the shortest period of time and no later than thirty days from the date of submission of the request in accordance with Article 13 of the Personal Data Protection Law. However, if the action in question incurs another cost, the price set by the Board may be collected. Our Company may accept the application or decline it on justified grounds and communicate its response to you in writing. You will be reimbursed for the application fee if the application has been lodged due to a mistake made by the Company.

It is required that your demand is clear, understandable and concerning your personality; and if you are acting on behalf of someone else, you must be specifically authorized and document your authority, the identity and address information and the documents supporting your identity must also be added to the application you lodged as a data subject to use your abovementioned rights containing your description thereof.

The information given by the applicant must be correct and up-to-date. Our Company accepts no responsibility for claims due to inaccurate or incomplete information or unauthorized application. Our Company reserves the right to request additional information and documentation (e.g. copy of identity card or copy of driver's license) for your identification in order to ensure data security (e.g. copy of identity card or copy of driver's license).