A D C O PETROL KATKILARI SANAYİ VE TİCARET ANONİM ŞİRKETİ

DISCLOSURE TEXT

As A D C O PETROL KATKILARI SANAYİ VE TİCARET ANONİM ŞİRKETİ ("A D C O" or "Şirket"); in the capacity of data controller, in line with the importance we attach to the security of your personal data, all personal data we hold in our organization is processed, stored and transferred in accordance with the Law on Protection of Personal Data No. 6698 ("LPPD"). Within the scope of this responsibility, in the capacity of the "Data Controller" as defined in the LPPD, we process your personal and sensitive data ("personal data") as explained below and within the limits set forth in the legislation. The concepts of personal data, sensitive data, data processing, relevant person, and data controller used in this Disclosure Text are based on the definitions made in the LPPD.

This Disclosure Text has been prepared for the purpose of informing Partners/Shareholders, Employees of Potential Product and/or Service Recipients, Employees of Product and/or Service Recipients, Supplier Employees/Authorized Persons, Visitors, Persons Seeking References, Consultants with whom contractual work is carried out, Legal Advisors, and other third parties whose personal data is processed within the scope of contract and business relationship, in accordance with the Fulfilment of the Information Obligation within the scope of the LPPD regarding your personal data collected, stored and processed by our Company.

Separate Disclosure Texts have been implemented to inform Employees, Employee Candidates, and Interns.

1. DATA CONTROLLER

Your personal data may be processed by A D C O as the Data Controller as explained below within the limits stipulated under the legislation per the LPPD.

INFORMATION ABOUT THE DATA CONTROLLER

Data Controller Company	: A D C O PETROL KATKILARI SANAYİ VE TİCARET ANONİM ŞİRKETİ
Phone Number	: +90 (212) 252 08 40
E-Mail	: oya.kala@adco.com.tr
Address	: Hacımimi Mah. Kemeraltı Cad. No.15 Kat 4 Karaköy 34425 İstanbul
Registered Electronic Mail	: adco@hs01.kep.tr

2. PERSONAL DATA CATEGORIES AND PURPOSE OF PROCESSING AND TRANSFERRING PERSONAL DATA

Your personal data, which is categorized in accordance with the principles set forth in Article 4 of the LPPD, is processed for the following purposes:

Identity Data: First name, last name, date of birth, country of birth, city of birth, gender, marital status, nationality, information on the Turkish identity card (Turkish Republic ID number, serial number, certificate number, sequence number, volume number, registration number, province/district/village/neighbourhood of registration, place of issue, reason for issue, date of issue, signature, etc.

Contact Data: Address information, address number, telephone number, e-mail address, mobile phone number, corporate e-mail address, registered electronic mail address, internal company contact information, extension phone number, fax number, etc.:

For the purposes of execution of emergency management processes, ensuring corporate communication, being able to carry out works and transactions as a result of signed contracts and protocols, ensuring that legal obligations are fulfilled as required or made mandatory by legal regulations, contacting real/legal persons who have business relations with the company, making legal reports, ensuring that goods and services sales processes are carried out, managing storage and archive activities, carrying out business continuity activities,

planning and executing corporate communication and management activities, carrying out finance and accounting works, carrying out/auditing of business activities, carrying out occupational health/safety activities, carrying out logistics activities, carrying out goods/services purchasing processes, carrying out goods/services after-sales support services, carrying out goods/services sales processes, carrying out marketing analysis studies, carrying out advertising/campaign/promotion processes, carrying out risk management processes, carrying out contract processes, carrying out strategic planning activities, monitoring complaints, ensuring the security of movable goods and resources, execution of supply chain management processes, execution of marketing processes of products/services, ensuring the security of data controller operations, execution of management activities, managing relations with suppliers, creating visitor records, ensuring physical space security, fulfilling obligations arising from legislation, fulfilling other legal obligations to authorized and authorized public institutions and organizations, execution of emergency management processes, resolving problems and complaints you convey to us, and execution of customer relations management processes in relation to this when necessary.

Finance: Personal data processed regarding information, documents, and records showing all kinds of financial results, and data such as bank account number, IBAN, financial profile-performance information, asset data, income information, and balance sheet information:

For the purposes of keeping accounting records and opening current account, ensuring the execution of financial and accounting affairs, communicating with you regarding these issues, conducting audit/ethics activities, internal audit/investigation/intelligence activities, goods/services purchasing processes, goods/services sales processes, risk management processes, contract processes, and strategic planning activities, providing information to authorized persons, institutions and organizations, conducting activities per legislation, following and conducting legal affairs, and conducting investment processes.

Safety and Security of Physical Space: Camera recordings:

For the purposes of ensuring physical space safety and security, and creating and monitoring visitor records.

Risk Management: Information processed to manage commercial, technical, and administrative risks, signature circulars, signature declarations, powers of attorney, etc.:

For the purposes of carrying out activities under the legislation, carrying out goods/service sales processes.

Legal Transactions: Data processed within the scope of power of attorney, determination and follow-up of legal receivables and rights, and fulfilment of debts and legal obligations:

For the purposes of fulfilling other legal obligations towards authorized and official public institutions and organizations, using as evidence in disputes that may arise between us, and ensuring that activities are carried out in accordance with the legislation.

Customer Transactions: Identity and invoice information (Republic of Turkey identity number, tax number, sole proprietorship information), IBAN, goods/service offer and request information, etc.:

For the purposes of ensuring the execution of goods/service procurement processes, carrying out finance and accounting tasks, and fulfilment of obligations arising from the legislation.

Visual and Audio Data: Photographs and camera recordings (excluding records included in the Safety and Security of Physical Space Information)

3. TO WHOM AND FOR WHAT PURPOSES PERSONAL DATA MAY BE TRANSFERRED

The Company complies with the regulations regarding the processing of sensitive personal data specified in Articles 5 and 6 of the Law, the regulations regarding the transfer of personal data specified in Articles 8 and 9, and the principles published by the Personal Data Protection Authority. Sensitive data is not transferred without the explicit consent of the data owner.

Your personal data may be transferred to authorized and official public institutions and organizations to fulfil

the obligations arising from the legislation within the scope of the Law and other legislation, to supervisory and regulatory institutions to provide information to authorized persons, institutions and organizations, to all kinds of judicial authorities to be used as evidence in legal disputes that may arise between us, to your authorized representatives and lawyers, to third parties from whom we receive consultancy, including tax and financial consultants, to conduct / auditing business activities and conduct activities under the legislation, to our group companies, to our business partners, to professional experts and expert assistants with whom we have a contractual business relationship, to consultants and advisors, to service providers and courier companies.

4. METHOD AND LEGAL REASON OF COLLECTING YOUR PERSONAL DATA

The "legal reason" specified in subparagraph (ç) of the first paragraph of Article 10 of the LPPD means the processing of personal data within the scope of the obligation to inform, based on which of the processing conditions specified in Articles 5 and 6 of the Law.

Personal data, information that we personally request from you due to legitimate interest, your personal data that you share with us physically and digitally within the scope of the business relationship; your contract information, financial data and invoice information that you submit, your digital applications made through our websites, information that you submit via e-mail and registered electronic mail, your petitions and applications, legal notifications, your correspondence with our Company, cargo shipments, data collected through all kinds of communication channels including applications made to our Company within the scope of Article 11 of the LPPD, during the execution of service procurement transactions, during operational support transactions (delivery note, invoice preparation, acceptance of return invoice, etc.), during accounting transactions, as a result of the evaluation of incoming requests, data obtained during purchasing transactions and verbal information you convey, data that you share through social media accounts are collected in electronic and physical environments and stored within the scope of legal periods and the conditions required by the business.

Your personal data is collected and processed based on at least one of the following legal reasons, including the following Articles of the Law of Personal Data Protection, and when necessary, the provisions of Explicit Consent.
Article 5/2-c: *"Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract."*
Article 5/2-ç: *"It is necessary for compliance with a legal obligation to which the data controller is subject."*
Article 5/2-e: *"Data processing is necessary for the establishment, exercise or protection of any right."*
Article 5/2-f: *"Processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject."*
Our Company does not collect data without a valid purpose and a valid legal reason or without the application of explicit consent.

5. RIGHTS OF THE PERSONAL DATA OWNER AND APPLICATION METHODS

Our company informs the personal data owner about their rights in accordance with Article 10 of the Personal Data Protection Law and guides the personal data owner on how to exercise these rights.

Within the scope of Article 11 of the LPPD, personal data owners have the right to apply to our Company and;

a) Learn whether their personal data has been processed, b) Request information about the processing of their personal data, c) Learn the purpose of processing their personal data and whether it is used in accordance with its purpose, d) Know the third parties to whom their personal data has been transferred domestically or abroad, e) Request correction of their personal data if it has been processed incompletely or incorrectly, f) Request deletion or destruction of data within the framework of the conditions stipulated in Article 7 of the LPPD, provided that the legal obligations of our company are reserved, g) Request notification of the transactions made pursuant to clauses (e) and (f) above to third parties to whom their personal data has been transferred, h) Object to the emergence of a result against you due to the analysis of their personal data exclusively by automated systems, i) Request compensation for the damages in case you suffer damages due to the processing of your personal data in violation of the law.

To exercise your rights specified in Article 11 of the LPPD, you can personally submit your application to the address “Hacımimi Mah. Kemeraltı Cad. No.15 Kat 4 34424 Karaköy/ İstanbul”, send it via notary or (KEP) Registered Electronic Mail adco@hs01.kep.tr with secure electronic signature, mobile signature or your electronic mail address previously notified to the data controller by the relevant person and registered in the data controller’s system. Your request will be finalized free of charge as soon as possible and within thirty days at the latest, depending on its nature. If the transaction creates an additional cost for **A D C O**, you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board. In case the request is rejected, the reasons for rejection will be notified to the data owner in writing or electronically with the reasons.