

CLARIFICATION TEXT FOR THE PERSONAL DATA PROCESSING

Data Supervisor	: Rovenma Elektronik Sanayi ve Ticaret Anonim Şirketi (Hereinafter referred to as Rovenma.)
Service Address	: Ünitersiteler Mahallesi 1596 Cadde No: 6A/27 Çankaya Ankara
Website	: www.rovenma.com
Telephone	: 0(312) 397 54 54
KEP (Registered Electronic Mail Address)	: rovenma@hs01.kep.tr

The protection of personal data is a delicate and important issue for our company with respect to the importance and security of the data. We pay attention to the processing of your Personal Data within the framework of Law No. 6698, and National and International legislation. As the Data Supervisor, the principles stipulated by the law are adopted in order to comply with the Law No. 6698 on Protection of Personal Data, and obligations related to the processing, deletion, destruction, anonymization, transfer, clarification of the person concerned and ensuring data security of personal data are fulfilled.

Within the framework of the Law No. 6698 on Protection of Personal Data and the activities arising from the applicable legislation and legal regulations, regarding the processing, storage and transfer of your personal data, we have prepared this clarification text in order to inform you and;

- Our employees,
- Our potential product or service buyers,
- People that purchase products or services and their employees,
- Public employees,
- Our business partners and stakeholders,
- Our guest,
- Our suppliers and employees,
- Our trainee

Scope of the Clarification Text

This Clarification Text includes;

- a. Personal data collection methods and their legal grounds,
- b. Categorization of data subject groups and personal data processed
- c. In which business processes and for what purposes personal data are used,
- d. Administrative and technical measures taken to ensure the security of personal data,
- e. Transfer of personal data,
- f. Personal data storage periods and methods of destruction,
- g. Rights of the persons concerned

a) METHODS OF COLLECTING PERSONAL DATA AND THEIR LEGAL GROUNDS

Pursuant to the Article 1, which regulates the purpose of the law, and Article 2, which regulates the scope of the law, Personal Data is collected by technical and other methods in any oral, written, electronic environment; in order to realize the objectives stated in our company's website and policy; in order to fulfill the responsibilities arising from the law in a complete and correct manner within the framework of legislation, contract, demand and optional legal reasons; and is processed by our company or the people who process data assigned by our company.

Rovenma collects personal data in audio, electronic or written form in accordance with Personal Data Protection Law No. 6698 and other relevant legislation through the followings: websites, notifications received from administrative and judicial authorities, application forms, employment contracts, contracts, CV's, electronic tracking and physical access control systems (e.g. biometric and card access systems, CCTV), information systems and electronic devices (e.g.: telecommunications infrastructure, computers and telephones), İŞKUR (Turkish Employment Agency) and private employment offices (including Kariyer.net, etc.), parties providing Headhunter services, third parties (e.g.KKB and Findeks), online website, Cookies / Cookies created by our own site), site usage measurement systems (e.g. Google Analytics), visitor registration processes, documents received for administrative and commercial activities, and other documents submitted by the person concerned

b) CATEGORIZATION OF DATA SUBJECT GROUPS AND PERSONAL DATA PROCESSED

- Our employee candidates,
- Our interns,
- Our employees,
- Our business partners and stakeholders
- Our potential product or service buyers,
- People that purchase products or services and their employees,
- Public employees,
- Public institutions and organizations,
- Our guests,
- Employees of our suppliers,
- The executives of our suppliers,
- Board members.

Data Category

1- Identity: Name surname, Mother- father name, Mother maiden name, Date of birth, Place of birth, Marital status, Identity card serial-order number, RT identity number etc.

2- Contact: Address number, E-mail address, contact address, Registered e-mail address (KEP), Phone number etc. (Personal Data)

3- Personal information: Payroll information, Disciplinary proceeding, Employment certificate records, Declaration of property information, CV information, Performance evaluation reports, etc. (Personal Data)

4- Legal Action: Information contained in correspondence with judicial authorities, information in the case file, etc. (Personal Data)

5- Customer Transaction: Call center records, Invoice, promissory note, cheque information, Information on the pay desk receipts, Order information, Request Information etc. (Personal Data)

6- Physical Space Security: Entry and exit registration information of employees and visitors, Camera records etc. (Personal Data)

7- Processing Security: IP address information, Web site login and exit information, Password information, etc. (Personal Data)

8- Risk Management: Information processed for the management of commercial, technical and administrative risks, etc. (Personal Data)

9- Finance: Balance sheet information, Financial performance information, Credit and risk information, Asset information etc. (Personal Data)

10- Professional experience: Diploma information, Courses attended, Professional training information, Certificates, Transcript information, etc. (Personal Data)

11- Visual and Audio Recordings: Audiovisual recordings, etc. (Personal Data)

12- Philosophical belief, Religion, Sect and Other Beliefs: Information on other beliefs, information on religious belonging, information on philosophical belief, information on sectarian belonging etc. (Sensitive Personal Data)

13- Health Information: Information about disability status, blood group information, personal health information, information for device and prosthesis used etc. (Sensitive Personal Data)

14- Criminal Conviction And Security Measures: Information on criminal conviction, Information on security measures etc. (Sensitive Personal Data)

15- Biometric Data: Palm information, Fingerprint information, Retina scan information, Face recognition information etc. (Sensitive Personal Data)

c) IN WHICH BUSINESS PROCESSES AND FOR WHICH PURPOSES IS PERSONAL DATA USED?

1- IDENTITY

- Foreign Personnel Work and Residence Permit procedures
- Performing Business Continuity Activities
- Formation and Monitoring of Visitor Records
- Execution of Management Activities
- Giving Information to Authorized Persons, Institutions and Organizations
- Carrying out Talent / Career Development Activities
- Execution of Investment Processes

- Ensuring the Security of Data Supervision Operations
- Execution of Wage Policy
- Execution of Supply Chain Management Processes
- Ensuring the Security of Movable Goods and Resources
- Requests / Complaints Monitoring
- Execution of Strategic Planning Activities
- Execution of Contract Strategies
- Execution of Saving and Archive Activities
- Execution of Risk Management Processes
- Execution of Performance Evaluation Strategies
- Organization And Event Management
- Conducting Activities for Customer Satisfaction
- Execution of Customer Relationship Management Processes
- Execution of Goods / Services Production and Operation Processes
- Execution of Goods / Services Sales Processes
- Giving After Sale-Support for Goods/Services
- Execution of Goods / Services Purchasing Processes
- Execution of Logistics Activities
- Obtaining and Evaluating Proposals for Improving Business Processes
- Execution of Occupational Health / Safety Activities
- Execution and Control of Business Activities
- Planning Human Resources Processes,
- Performing Communication Activities
- Conducting Internal Audit / Investigation / Intelligence Activities
- Legal Procedures Monitoring and Execution
- Execution of Appointment Processes
- Ensuring Physical Space Security
- Execution of Financial and Accounting Processes
- Execution of Activities as per the Legislation
- Execution of Access Rights
- Execution of Training Activities
- Execution of Audit and Ethical Activities
- Execution of the Vested Benefits and Benefits Processes for Employees
- Fulfillment of Liabilities Arising from Employment Contract and Legislation for Employees
- Execution of the Application Process of Employee Candidates
- Conducting Employee Candidate / Trainee Student Selection and Placement Processes
- Execution of Information Security Processes
- Execution of Emergency Management Processes

2- CONTACT

- Foreign Personnel Work and Residence Permit procedures
- Execution of Management Activities
- Giving Information to Authorized Persons, Institutions and Organizations
- Performing Talent / Career Development Activities
- Execution of Investment Processes
- Execution of Wage Policy
- Execution of Supply Chain Management Processes

- Ensuring the Security of Movable Goods and Resources
- Requests / Complaints Monitoring
- Execution of Contract Processes
- Social Responsibility and Civil Society Activities
- Execution of Custody and Archive Activities
- Execution of Risk Management Processes
- Organization And Event Management
- Execution of Customer Relationship Management Processes
- Execution of Goods / Services Production and Operation Processes
- Execution of Goods / Services Sales Processes
- Giving After Sale-Support for Goods/Services
- Execution of Goods / Services Purchasing Processes
- Execution of Logistics Activities
- Execution of Occupational Health / Safety Activities
- Execution / Control of Business Activities
- Planning Human Resources Processes
- Conducting Communication Activities
- Conducting Business Audit / Investigation / Intelligence Activities
- Legal Affairs Monitoring And Execution
- Ensuring Physical Space Security
- Execution of Financial and Accounting Affairs
- Execution of Training Activities
- Execution of the Vested Benefits and Benefits Processes for Employees
- Fulfillment of Liabilities Arising from Employment Contract and Legislation for Employees
- Execution of the Application Process of Employee Candidates
- Conducting Employee Candidate / Trainee Student Selection and Placement Processes
- Execution of Information Security Processes
- Execution of Emergency Management Processes

3- PERSONAL

- Foreign Personnel Work and Residence Permit procedures
- Execution of the Vested Benefits and Benefits Processes for Employees
- Execution of Management Activities
- Giving Information to Authorized Persons, Institutions and Organizations
- Performing Talent / Career Development Activities
- Ensuring the Security of Data Supervisor Operations
- Execution of Wage Policy
- Requests / Complaints Monitoring
- Execution of Contract Processes
- Execution of Saving and Archive Processes
- Execution of Performance Evaluation Strategies
- Execution of Occupational Health / Safety Activities
- Conducting Business Activities / Audit
- Planning Human Resources Processes
- Conducting Communication Activities
- Conducting Internal Audit / Investigation / Intelligence Activities
- Legal Affairs Monitoring And Execution

- Execution of Financial and Accounting Affairs
- Performing the Activities as per the Legislation
- Execution of Training Activities
- Execution of Audit / Etiquette Activities
- Fulfillment of Liabilities Arising from Employment Contract and Legislation for Employees
- Execution of Information Security Processes

4- LEGAL ACTION

- Foreign Personnel Work and Residence Permit procedures
- Giving Information to Authorized Persons, Institutions and Organizations
- Ensuring the Security of Data Supervisor Operations
- Execution of Wage Policy
- Execution of Supply Chain Management Processes
- Execution of Contract Processes
- Execution of Saving and Archive Processes
- Execution of Goods / Services Sales Processes
- Giving After Sale-Support for Goods/Services
- Execution of Goods / Services Purchasing Processes
- Execution of Occupational Health / Safety Activities
- Legal Affairs Follow-up And Execution
- Execution of Financial and Accounting Affairs
- Performing the Activities as per the Legislation
- Fulfillment of Liabilities Arising from Employment Contract and Legislation for Employees

5- COSTUMER TRANSACTION

- Execution of Management Activities
- Giving Information to Authorized Persons, Institutions and Organizations
- Execution of Wage Policy
- Requests / Complaints Monitoring
- Execution of Contract Processes
- Execution of Saving and Archive Processes
- Conducting Costumer Satisfaction Activities
- Execution of Costumer Relations Management Activities
- Execution of Goods / Services Production and Operation Processes
- Execution of Goods / Services Sales Processes
- Giving After Sale-Support for Goods/Services
- Conducting Business Activities / Audit
- Conducting Communication Activities
- Legal Affairs Monitoring And Execution
- Performing the Activities as per the Legislation

6- PHYSICAL SPACE SECURITY

- Performing the Activities as per the Legislation
- Other pursuant to Directive of the Ministry of National Defense Security of Defense Industry
- Formation and Monitoring of Visitor Records
- Giving Information to Authorized Persons, Institutions and Organizations
- Ensuring the Security of Data Supervisor Operations

- Ensuring the Security of Movable Goods and Resources
- Execution of Saving and Archive Processes
- Execution of Risk Management Processes
- Execution of Logistics Activities
- Execution of Occupational Health / Safety Activities
- Conducting Business Activities / Audit
- Legal Affairs Monitoring And Execution
- Ensuring Physical Space Security
- Execution of Information Security Processes
- Execution of Emergency Situations Management Processes

7- PROCESSING SECURITY

- Formation and Monitoring of Visitor Records
- Giving Information to Authorized Persons, Institutions and Organizations
- Ensuring the Security of Data Supervisor Operations
- Execution of Saving and Archive Processes
- Conducting Business Activities / Audit
- Planning Human Resources Processes,
- Conducting Communication Activities
- Conducting Internal Audit / Investigation / Intelligence Activities
- Legal Affairs Monitoring And Execution
- Performing the Activities as per the Legislation
- Controlling Access Authorities
- Execution of Audit / Etiquette Activities
- Fulfillment of Liabilities Arising from Employment Contract and Legislation for Employees
- Execution of Information Security Processes

8- RISK MANAGEMENT

- Giving Information to Authorized Persons, Institutions and Organizations
- Ensuring the Security of Data Supervisor Operations
- Ensuring the Security of Movable Goods and Resources
- Execution of Saving and Archive Processes
- Execution of Risk Management Processes
- Performing Business Continuity Activities
- Execution of Occupational Health / Safety Activities
- Planning Human Resources Processes
- Conducting Internal Audit / Investigation / Intelligence Activities
- Legal Affairs Tracking And Execution
- Controlling Access Authorities
- Performing the Activities as per the Legislation
- Execution of Audit / Etiquette Activities
- Fulfillment of Liabilities Arising from Employment Contract and Legislation for Employees
- Execution of Information Security Processes
- Execution of Emergency Situations Management Processes

9- FINANCE

- Execution of Management Activities
- Giving Information to Authorized Persons, Institutions and Organizations
- Execution of Investment Processes
- Foreign Personnel Work and Residence Permit procedures
- Execution of Wage Policy
- Execution of Supply Chain Management Processes
- Ensuring the Security of Movable Goods and Resources
- Execution of Contract Process
- Execution of Saving and Archive Processes
- Execution of Customer Relations Management Activities
- Execution of Goods / Services Production and Operation Processes
- Execution of Goods / Services Sales Processes
- Giving After Sale-Support for Goods/Services
- Execution of Sale-Purchase Processes
- Execution of Logistics Activities
- Conducting Internal Audit / Investigation / Intelligence Activities
- Legal Affairs Monitoring And Execution
- Execution of Financial and Accounting Processes
- Execution of Activities as per the Legislation
- Execution of Audit / Etiquette Activities
- Fulfillment of Liabilities Arising from Employment Contract and Legislation for Employees
- Execution of the Application Process of Employee Candidates
- Conducting Employee Candidate / Trainee Student Selection and Placement Processes

10- PROFESSIONAL EXPERIENCE

- Giving Information to Authorized Persons, Institutions and Organizations
- Performing Talent / Career Development Activities
- Foreign Personnel Work and Residence Permit procedures
- Execution of Wage Policy
- Execution of Saving and Archive Processes
- Execution of Performance Evaluation Strategies
- Execution of Goods / Services Production and Operation Processes
- Execution of Occupational Health / Safety Activities
- Conducting Business Activities / Audit
- Planning Human Resources Processes
- Performing Assignment Processes
- Execution of Activities as per the Legislation
- Execution of Training Activities
- Execution of Audit and Ethical Activities
- Fulfillment of Liabilities Arising from Employment Contract and Legislation for Employees
- Monitoring Employee Satisfaction and Loyalty Processes
- Execution of the Application Process of Employee Candidates
- Conducting Employee Candidate / Trainee Student Selection and Placement Processes

11- VISUAL AND AUDIO RECORDINGS

- Other pursuant to Directive of the Ministry of National Defense Security of Defense Industry

- Formation and Monitoring of Visitor Records
- Giving Information to Authorized Persons, Institutions and Organizations
- Foreign Personnel Work and Residence Permit procedures
- Ensuring the Security of Movable Goods and Resources
- Performing Social Responsibility and Civil Society Activities
- Execution of Risk Management Processes
- Management of Event and Organization
- Execution of Goods / Services Sales Processes
- Giving After Sale-Support for Goods/Services
- Execution of Logistics Activities
- Execution of Occupational Health / Safety Activities
- Conducting Business Activities / Audit
- Planning Human Resources Processes
- Conducting Internal Audit / Investigation / Intelligence Activities
- Legal Procedures Monitoring and Execution
- Execution of Assignment Processes
- Ensuring Physical Space Security
- Execution of Activities as per the Legislation
- Execution of Training Activities
- Fulfillment of Liabilities Arising from Employment Contract and Legislation for Employees
- Execution of the Application Process of Employee Candidates
- Conducting Employee Candidate / Trainee Student Selection and Placement Processes
- Execution of Information Security Processes
- Execution of Emergency Management Processes

12- PHILOSOPHICAL BELIEF, RELIGION, SECT AND OTHER BELIEFS

- Fulfillment of Liabilities Arising from Employment Contract and Legislation for Employees

13- HEALTH INFORMATION

- Giving Information to Authorized Persons, Institutions and Organizations
- Execution of Saving and Archive Processes
- Execution of Occupational Health / Safety Activities
- Planning Human Resources Processes,
- Legal Procedures Monitoring and Execution
- Execution of Assignment Processes
- Execution of Activities as per the Legislation
- Fulfillment of Liabilities Arising from Employment Contract and Legislation for Employees
- Execution of Emergency Management Processes

14- CRIMINAL CONVICTION AND SECURITY MEASURES

- Other pursuant to Directive of the Ministry of National Defense Security of Defense Industry
- Giving Information to Authorized Persons, Institutions and Organizations
- Planning Human Resources Processes,
- Execution of Activities as per the Legislation
- Fulfillment of Liabilities Arising from Employment Contract and Legislation for Employees
- Conducting Employee Candidate / Trainee Student Selection and Placement Processes
- Execution of Information Security Processes

15- BIOMETRIC DATA

- Execution of Wage Policy
- Conducting Business Activities / Audit
- Planning Human Resources Processes
- Execution of Access Authorities
- Execution of Information Security Processes

d) ADMINISTRATIVE AND TECHNICAL MEASURES REGARDING THE SECURITY OF PERSONAL DATA

During the period of processing your personal data, we pay utmost attention to take administrative and technical measures specified within the framework of the law numbered 6698, relevant legislation and decisions taken by the Personal Data Protection Board.

By taking the necessary administrative and technical measures, Rovenma prevents unauthorized access to personal data against risks that may occur inside or outside the company and from the processing, disclosure, modification or destruction of personal data illegally. Rovenma takes the administrative and technical measures mentioned below when processing personal data.

Applications for Administrative Measures:

- Preparation of personal data inventory
- Corporate policies (access, information security, usage, storage, destruction, etc.)
- Contracts (data supervisor-data supervisor, data supervisor-data processor)
- Privacy commitments
- In-house periodic and / or random audits
- Risk analyzes
- Employment contract, discipline regulation (adding legal provisions to the Law)
- Corporate communication (crisis management, information processes for the board and the related person, reputation management, etc.)
- Training and awareness activities (information security and law)
- Data supervisors notification to the registry information system (VERBİS)

Applications for Technical Measures:

- Authority matrix
- Authority control
- Access logs
- User account management
- Network security
- Application security
- Encryption
- Penetration test
- Intrusion detection and prevention systems
- Log records
- Backup
- Firewall
- Current anti-virus systems
- Delete, destroy, anonymize

- Key management

We pay attention to the privacy and security of your personal data. In this context, we ensure end-to-end data security by taking the above-mentioned administrative and technical measures. Despite the administrative and technical measures listed above, in case of personal data damage or unauthorized capture by third parties as a result of possible intrusion on our IT infrastructure, Rovenma will immediately notify you and the Personal Data Protection Board and declare to take the necessary measures.

e) TRANSFER OF PERSONAL DATA

Your personal data is transmitted to a limited extent within the conditions specified in Articles 8 and 9 of the Law, in order to ensure the best planning and implementation of our human resources policies, the correct planning and execution of our commercial partnerships and strategies, to ensure the legal, commercial and physical security of our company and our business partners, to ensure the corporate functioning of our company, to ensure the best use of the products and services offered by our company, and for the purposes of the followings: the products and services presented by us are customized according to your customers' demands, needs and wishes, providing the highest level of data security, creating databases, developing the services offered on our company website, contacting those who submit their demands and complaints to our company, eliminating the errors that occur on our company's website.

Your personal data can be transferred to: public institutions and organizations, our stakeholders, business partners, suppliers, affiliates, companies and institutions that we cooperate with, external companies and authorized institutions and organizations in order to fulfill our contractual or legal obligations. The nature of these transfers and the parties to which it is shared varies based on the type and nature of the relationship between the data owner and Rovenma, the purpose of the transfer and the relevant legal basis, these parties are generally as follows:

- Legal authorities such as law firms and institutions taking support for legal purposes,
- Business units within Rovenma to ensure coordination, cooperation and efficiency,
- Research firms within the scope of the objectives such as customer satisfaction, etc.,
- Banks that will enable financial transactions,
- Health institutions or hospitals in case of work accident,
- Relevant institutions for capacity report,
- Real persons or private legal entities,
- Our business partners,
- Our public affiliates and subsidiaries,
- Authorized public institutions and organizations,
- Shareholders,
- Our suppliers.

f) STORAGE PERIODS AND METHODS OF DESTRUCTION OF PERSONAL DATA

The principles regarding the storage period of your personal data are as follows:

- If a period of time is specified in the legal legislation that is subject to the company activities, the aforesaid data will be stored at least as determined.

•If a period is not specified for the data to be stored in the legal legislation that is subject to the Company's activities, it is stored for a specified period by considering the Principles of the Law No. 6698 in line with the purposes we have determined for the data processing activity.

Your personal data is destroyed at the end of the aforementioned periods using the methods of deletion and destruction.

g) RIGHTS OF THE PERSONS CONCERNED

As real persons whose data are processed within the scope of Article 11 of Law No. 6698, you can apply to us at any time and exercise your below-listed rights:

- Withdrawal your express consent,
- Learning whether your personal data is processed,
- If personal data is processed, requesting information about,
- Learning the purpose of processing personal data and whether they are used in accordance with its purpose,
- Being informed about the third parties to whom personal data are transferred domestically or abroad,
- Requesting correction of personal data if it is incomplete or incorrectly processed,
- Requesting the deletion or destruction of personal data within the conditions stipulated in article 7 of the Law,
- Requesting notification of the transactions performed in accordance with the clauses (d) and (e) of Article 11 of the Law to third parties to whom personal data are transferred,
- Raising objection to the emergence of a result against you by the reason of analyzing the processed data exclusively through automated systems,
- Requesting compensation of the damage in case the personal data is damaged due to unlawful processing.

You can apply for your requests regarding your above-listed rights for your personal data through the PDPL Application Form, which you can obtain from the www.rovenma.com website via Notary, Certified Mail or KEP Address or, applying to the relevant facility in person through getting the form from our service addresses.

Our company will conclude your request free of charge as soon as possible and within thirty (30) days at the latest, based on the nature of the request. However, if the transaction requires an additional cost, we will charge the tariff at the rate set by the Personal Data Protection Board.

Regards,

Rovenma Elektronik San. ve Tic. A.Ş.

Board of Directors