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EMPLOYEES PERSONAL DATA PROTECTION AND PROCESSING POLICY (GDPR)

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CHAPTER 1 - INTRODUCTION

1.1.Introduction

Law No. 6698 on the Protection of Personal Data ("**KVKK**") introduces important regulations regarding the protection and lawful processing of personal data.

Protection of personal data is among the most important priorities of **MANTAGAS DENIZCILIK VE TICARET LIMITED SIRKETI ("Company")**. The fact that the Company has appropriate processes in the processing of personal data will significantly increase its ability to act in accordance with the law and this will affect all related activities.

The activities carried out by the Company regarding the protection of personal data of the Company's employees are managed by the Company within the framework of the principles set out in this Mantagaz Denizcilik Employees Personal Data Protection and Processing Policy ("**Policy**").

1.2. Objective

This Policy regulates the rules that the Company must comply with when processing the personal data of the Company employees. Therefore, the purpose of this Policy is to explain the personal data processing activities carried out by the Company in accordance with the KVKK and the principles adopted for the protection of personal data and to ensure transparency by informing the persons whose personal data are processed by the Company.

1.3.Scope

The primary subject of this Policy is our Company. However, the implementation of this Policy and the regulations in the Policy concern the employees of our Company. Candidates applying for a job at our Company are covered by this Policy.

The units responsible for the processing of personal data of the employees of our Company will play the most important role in the execution of this Policy. Responsible units will receive support from the

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Personal Data Protection Committee ("PDP Committee") established by our Company within the scope of the execution of this Policy or from the responsible person or persons assigned in this regard.

1.4.Relationship of this Policy with Other Policies

This Policy regulates the actions to be taken by our Company regarding the processing of personal data of Company employees and outlines the framework of the policy to be established for its own employees. In cases where there are no provisions in this Policy, the provisions of the general policies on the processing of personal data shall apply.

1.5.Updatability

This Policy may be updated from time to time in order to adapt to changing conditions and legislation. If updated, the update will be notified to the relevant persons via www.mantagas.com, via Official Mail and Nozzle Application.

CHAPTER 2 - PERSONAL DATA COLLECTION IN THE RECRUITMENT PROCESS

2.1.Steps to be Followed in Job Advertisements and Application Processes

2.1.1. Specifying the Advertiser Company Information

Our Company may initiate the recruitment process for vacant positions with a job advertisement (website, newspaper advertisement, through employment or consultancy companies or similar methods) or evaluate the CVs submitted to them. Our Company takes care to process the personal data of candidates in accordance with the law and to fulfil its information obligations. In this context, the title and contact information of the relevant Company are clearly stated in each job advertisement or application form. If our Company initiate the recruitment process through an employment or consultancy company, they take measures to ensure that it is specified how the personal data collected by the employment or consultancy company will be used and shared.

2.1. 2 Compatibility of the Personal Data Collected with the Recruitment Process

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In order to fulfil the obligation to inform the personal data owner, our company informs the candidates about the purpose for which the collected personal data is collected. If it is foreseen that the collected personal data will be used or shared for a position or purpose other than the position applied by the candidate, these purposes of use and sharing are clearly stated. The questions asked to collect personal data during the recruitment process and the forms prepared to collect personal data are evaluated according to each type of vacant position and measures are taken to prevent unnecessary personal data collection (for example, questions may be asked about the candidates' name, surname, address, date of birth, e-mail address, work experience and education). Some personal data collected from employees should not be requested before the candidate's recruitment is approved (e.g. bank account details).

It may be necessary to process more extensive personal data depending on the nature of the job for which the candidate is applying. However, such personal data must be appropriate to the nature of the job. Personal data requested due to the nature of the job should only be valid for the relevant position.

2.1. 3 Processing of Special Categories of Personal Data

Data relating to the race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life and criminal convictions, and biometric and genetic data of employee candidates are sensitive personal data.

Except for those required by legal obligation or the nature of the job, our company cannot discriminate on the basis of special categories of personal data in order to make a recruitment decision or process special categories of personal data for these purposes in the recruitment process. If it is necessary to process special categories of personal data due to the nature of the job or legal obligation, only special categories of personal data that fall within this scope can be processed as limited as possible. In such a case, the candidate is informed with the "Clarification Text" about the reason for requesting the special categories of personal data to be processed and the purpose of use. If the special categories of personal data required to be requested are of a nature that can be collected from the candidate at later stages, these data cannot be requested at the first stage of the recruitment process.

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2.1. 4 Steps to Be Followed During the Interview

Our company may conduct interviews with candidates via video conferencing, telephone or in person. Our Company informs its employees who conduct the interview about how the personal data collected during the interview will be recorded and stored. If the relevant candidate requests to exercise his/her legal rights regarding his/her personal data regarding the personal data recorded during the interview by the relevant persons conducting the interview; this request shall be responded by our Company within 30 days at the latest.

Our company informs the employees who will conduct the interview about this issue. Our Company takes the necessary measures for the utilisation of the legal rights that may be claimed by the candidate.

2.2. Steps to be followed in Pre-employment Investigations or Controls

2.2.1 Checking the Accuracy of Personal Data Provided by Candidates and Conducting Additional Research

The accuracy of the personal data submitted by the candidates during the recruitment process can be confirmed by our Company from other sources. The check is made only to confirm the accuracy of the personal data submitted by the candidate. In the event that the accuracy of the personal data submitted by the candidate is checked, our Company informs the candidate about this issue (about the personal data to be checked, the control method and sources to be used) and obtains his/her consent if explicit consent is required. In addition, in case of inconsistency between the information obtained as a result of the check and the personal data transmitted, the candidate is given the opportunity to explain the situation.

In addition, in some special cases, our Company may actively seek to obtain additional information about the candidate. Instead of conducting research, care should be taken to obtain the requested information from the candidate as much as possible. All of the following conditions must be fulfilled in order to conduct research on the candidate:

- The methods used must be in accordance with the law.

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- In the event that the personal data to be investigated cannot be collected, there should be a risk for our Company or our customers and/or business partners.
- There must be no more reasonable alternative to achieve the same objective.

Our company takes care to determine in advance which positions require additional research in the light of the above conditions.

Our company endeavours to include as much as possible in the job application form or additional explanatory information note that research will be conducted on candidates, the scope of the research and the types of sources to be used for the research. The candidate is also informed about which personal data of the candidate will be shared in order to obtain information from the relevant sources during the research.

2.2.2 Time of the Study

If our company deems it necessary to conduct additional research on the candidates, the candidates are notified of the research to be conducted on them at the initial stages of the recruitment process. In the event that our company conducts a research on the applicant, the research is carried out as close to the finalisation of the recruitment process as possible. Comprehensive research is not carried out on all pre-qualified candidates. However, comprehensive research may be carried out on candidates who are likely to be selected for the vacant position.

2.2.3 Research Method

Our Company selects the sources meticulously while researching about the candidate. In this context, our Company must comply with the following principles:

- In order to request the researched information from the relevant source, the probability of obtaining the information from that source should be high.
- In exceptional cases, the candidate's family or close friends should be consulted.
- The information obtained as a result of the research should be evaluated according to the reliability of the source.

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- No employment decision should be based on a source of questionable reliability.
- Information obtained from sources of uncertain reliability should not be relied upon.
- Our company must inform the relevant employee within its own organisation or the persons who will undertake the research about the research method.
- If the result of the research is unfavourable to the candidate, the candidate must be informed about this situation. Our company should carry out activities to ensure that the applicant is informed about the result and that the candidate can make an explanation about the situation if he/she wishes.
- The candidate's explanation of the result must be taken into account.
- Care should be taken not to obtain personal data on a person other than the candidate during the research.
- In the event that personal data relating to a person other than the candidate is collected and processed, the person concerned must be informed about the situation in question and the method of processing the information. Necessary activities must be carried out in order to realise this information.

2.2.4 Obtaining Permission for Research

If the collection of information and documents from a third party during the research depends on the consent of the candidate, our Company must obtain explicit consent from the candidate. Instead of obtaining explicit consent from a third party, the method of obtaining explicit consent directly from the candidate should be preferred as much as possible.

2.3 Storage and Security of Candidates' Personal Data

2.3.1 Security of Candidates' Personal Data

During the recruitment process, our Company shows the same care it shows regarding the protection of personal data of employees to job applicants. In this context, especially the following measures are taken:

- If applications are submitted digitally, our Company must establish a secure system. Applications submitted electronically are saved in directories or systems that can only be accessed by the persons responsible for the recruitment process.

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- If the applications are submitted by post or fax, it is ensured that the applications are forwarded to the authorised person responsible for human resources. The security of the physical documents obtained is ensured. Our company limits access to the personal data of candidates to the persons in charge of carrying out recruitment processes. These persons are regularly informed about the processing of personal data of candidates and the security measures to be taken.

2.3.2 Retention Period of Personal Data related to Recruitment Process

Our company takes all kinds of technical, administrative and legal measures to prevent unlawful processing of personal data related to the recruitment process and unlawful access to this data. Our company stores the personal data of the candidate regarding the recruitment process for a period of time that is appropriate for the purposes for which this data is processed. In accordance with the labour law and other relevant regulations, personal data are deleted, destroyed or anonymised by our Company or upon the request of the candidate, if the reasons requiring their processing disappear. Unless there is a valid reason (such as possible dispute resolution), our Company does not retain the relevant personal data after the expiry of the statute of limitations for claims that may arise from the recruitment process. After the expiry of the relevant statute of limitations, the personal data of the candidate may continue to be anonymised and stored.

If research has been conducted on the status of the candidate during the recruitment process or data has been obtained from third parties in any way, the information obtained from third parties will be deleted as soon as possible. Our company may keep the results of the research by stating whether the research was conducted, the result of the research and whether the candidate was recruited or not.

2.3.3 Personal Data of Recruited Candidates to be Transferred to Employee Records

Our company carefully determines which personal data obtained during the candidacy process will be transferred to the personal files of successful candidates accepted for open positions. Personal data that are not required by the business relationship and the scope of the personnel file are not transferred to the personnel file of the new employee.

2.3.4 Personal Data of Candidates Whose Applications Are Not Accepted

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If our company wishes to evaluate unsuccessful applications for future positions, they may keep the personal data of the candidates in the records. If personal data will be kept for this purpose, our Company must inform the candidates about this in the job application form or additional explanatory documents and state that the information can be deleted from the records upon request.

SECTION 3 - PROCESSING OF EMPLOYEE DATA

3.1 General Approach to Processing Personal Data of Employees

3.1.1 Informing Employees and Personal Data Processing Conditions

Our company informs its employees about the personal data processed about them, the purposes and reasons for which personal data will be processed, the sources from which personal data are collected, with whom these personal data will be shared and how they will be used.

Our company evaluates the personal data it processes and processes this data based on at least one of the conditions specified in the KVKK. These conditions are

- Explicit consent of the employee,
- Data processing is clearly stipulated in the relevant laws,
- Failure to obtain the explicit consent of the employee due to actual impossibility,
- Data processing is directly related to the establishment or performance of a contract,
- Data processing is mandatory for our company to fulfil its legal obligation,
- The personal data has been made public by the personal data subject himself/herself,
- Data processing is mandatory for the establishment or protection of a right,
- Processing of data based on legitimate interest.

Personal data processing activity may be carried out in the presence of at least one of these conditions. Data processing activity may be carried out based on one or more of the conditions.

In cases where explicit consent is required, the process of obtaining such explicit consent is completed before the processing of personal data. Our Company determines and implements the most beneficial

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method for informing employees regarding the storage, use and sharing of their personal data according to their specific conditions.

3.1.2 Collecting Personal Data as Necessary in Line with Needs

Our Company collects personal data from employees based on a clear and foreseeable need. Our Company ensures that the data collected is suitable to meet the aforementioned needs.

In order to ensure compliance with the above-mentioned principle, all forms and input methods in which employees enter personal data are audited. This audit is completed as soon as possible for existing forms and input methods; for new forms and input methods to be created, before they are started to be used. As a result of the audit, the parts that provide unnecessary data collection are removed from the relevant form and input method. In addition, personal data obtained through these parts are immediately deleted, destroyed or anonymised.

3.1.3 Keeping Personal Data Up-to-Date

Our company takes the necessary measures to ensure that the personal data of employees are up-to-date. In this context, special attention is paid to the following issues:

- Employees' personal data (address, telephone, family/relative information, etc.) that are likely to change are identified.
- Measures are taken to ensure that personal data that are likely to change can be easily seen in electronic media.
- It is ensured that personal data that are likely to change are not seen by everyone in electronic media; only by the relevant employee and other access authorities.
- If it is not possible for employees to see personal data that are likely to change in electronic environment; necessary measures are taken to display these personal data in physical environment.
- It is ensured that employees keep their personal data, which may change, up to date. In this context, active follow-up is carried out by human resources personnel regarding awareness activities. Apart

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from the method described above, our Company take the necessary measures to keep the personal data of the employees being processed up to date according to their specific conditions.

3.2 Processing of Special Categories of Employee Data

Some of the personal data are regulated separately as "special categories of personal data" under the PDP Law and are subject to special protection. Special categories of personal data are data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership to associations, foundations or trade unions, health, sexual life, criminal convictions, and biometric and genetic data.

Our company may process health data in the following cases, provided that adequate measures to be determined by the Personal Data Protection Board are taken in cases where the employee does not have explicit consent:

- (i) Sensitive personal data other than the employee's health and sexual life, only in cases stipulated by law,
- (ii) The personal data of special nature relating to the health and sexual life of the employee may be processed by persons under the obligation of confidentiality or authorised institutions and organisations for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

SECTION 4 - DATA ON THE HEALTH OF EMPLOYEES

4.1 General Approach to the Processing of Health Data of Employees

4.1.1 Non-Processing and Separate Storage of Health Data Unless Necessary

Health data is among the special categories of personal data. Health data of employees, especially accident and illness reports of employees, are stored separately from other personal data. When using information about the days the employee is absent from work or accidents and other incidents in which the employee is involved, the use of the employee's health data is avoided as much as possible.

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4.1.2 Processing of Health Data in Connection with the Specified Purpose, Limited and Measured

In health surveys to be conducted to employees, our company makes sure that only the information that is really necessary is collected and takes care not to request unnecessary information.

Our company cannot ask employees to give a general explicit consent to share all their health data with the company. Our company may only request the sharing of health data with the company that is considered to be really necessary for the specified purpose.

4.1.3 Identification of Persons to Process Health Data

It is ensured that the employees of our Company who will process or authorise the processing of the health data of the employees are informed about the relevant legislation and the privacy policy established. The health data of the employee is analysed by persons who are competent to do this job. Our Company takes care to inform employees in an understandable manner for which purposes their health data are used and who has access to these data and for what purpose.

4.1.4 Sharing and Access to Health Data

In the sharing of health data, these sharing transactions are carried out by taking into account the legal obligations imposed for sensitive personal data and in accordance with these obligations.

Our Company regularly ensures that the persons dealing with the health data of the employees are informed and trained about the above situations. In addition, our Company makes arrangements for these persons to receive the necessary support from the PDP Committee or the officials assigned for the protection of personal data.

As a rule, our Company does not make the health data of employees accessible to other employees. However, if it is legally required by the legitimate interests of our Company to process a job and this data in relation to this job; necessary administrative and technical measures are taken for the personnel

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in charge of this job to process this personal data, provided that they are limited to fulfilling the requirements of the job, and they are provided with the right of access.

Health data that managers need to know compulsorily in order to fulfil their managerial roles may be disclosed to managers. The managers of our company are informed about the sensitivity of health data and the processing conditions of this data in the KVKK before the health data is shared with them.

4.2 Processing of Health Data Obtained from Examinations and Tests

4.2.1 Notification of the Company Policy on the Processing of Health Data to Employees

Our company pays attention to the transparency of the policies followed regarding the processing of employees' health data. Our Company determines the conditions regarding the places where health tests will be performed, the nature of the tests, how the data obtained as a result of the test will be used and protected. It takes care to inform employees about these conditions.

4.2.2 Processing of Health Data of Potential Recruitment Candidates through Examinations and Tests

Our Company may request tests to be carried out on prospective candidates to determine whether they are suitable for the job in question. It may also perform these tests to fulfil any legal obligation or to determine the type of insurance to which the prospective employee will be subject.

Our Company determines in advance the purposes for which examinations and tests will be carried out. Our Company follows methods that are less likely to interfere with the health data of the person, taking into account the purposes. During the recruitment process, a medical examination or health test is only carried out if there is a high probability that the person will actually be hired. In the early stages of the job application process, our company informs the candidate that a medical examination or test may be performed if there is a high probability of being hired.

4.2.3 Collection of Health Data of Employees through Examinations and Tests

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Our company may collect health data of employees through medical examinations and tests within the scope of occupational health and safety programme. Participation in examinations and tests other than mandatory examinations and tests according to legal legislation is left to the employee's own choice.

Our Company determines in advance the purposes for which examinations and tests will be carried out. Considering the purposes, our company follows methods that are less likely to interfere with the health data of the person. For example, in order to learn the health data of the employee, it may conduct a health survey instead of looking at the examination results.

4.2.4 Not to Use the Samples Obtained from the Examination for Purposes Other than the Specified Processing

Our company clearly informs employees about the purpose of health checks and tests. Our company cannot collect biometric/genetic samples (fingerprints, hair strands, etc.) of the employee in a confidential manner. Activities carried out based on legal reasons constitute an exception.

SECTION 5 - PROCESSING OF EMPLOYEE DATA

Our company obtains and processes personal data of employees for the following purposes:

- Supporting the processes of determining and monitoring the performance evaluation criteria of our company's employees,
- Supporting the work/residence permit application processes of foreign employees of our company,
- Supporting the planning and monitoring processes of the fringe benefits and benefits provided to the employees of our company,
- Supporting our company in strategic human resources planning, succession processes and organisational development activities,
- Implementation of the appointment, promotion and resignation decisions of the senior executives of our company and making the relevant announcements,

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- Supporting the planning and execution of our company's employee loyalty measurement processes,
- Supporting the planning and execution of career development, training and talent management activities of our employees,
- Carrying out activities to protect the reputation of the our Compnay, sustainability and social responsibility activities,
- Carrying out communication and communication activities for our company's employees, and carrying out processes to ensure employee satisfaction and loyalty.

SECTION 6 - SPECIAL CASES WHERE PERSONAL DATA OF EMPLOYEES ARE PROCESSED

6.1 Processing of Personal Data of Employees in cases where Fringe Benefits and Benefits are Provided

Private health insurance, life insurance, personal accident insurance, company car, private pension, flexible benefit programme or similar benefits are referred to as fringe benefits under this heading.

Our company pays attention to share data at a minimum level when sharing the personal data of employees with third parties from whom services are received to provide benefits and benefits to employees. Only the personal data that are mandatory for the provision of the relevant side rights and benefits are shared with the aforementioned third parties. In addition, necessary measures are taken to ensure that the personal data collected within this scope are not used for any other purpose.

It is evaluated whether the personal data to be shared with third parties from whom services are received are personal data of special nature before sharing. It is ensured that the employees are informed about the personal data to be shared with third parties. In this context, it is explained to the employee which personal data of the employees are shared and for what purpose they will be used.

6.3 Processing Personal Data of Employees within the Scope of Combating Irregularities

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Our Company may compare personal data sets in different units in order to prevent irregular transactions of employees. The rules for personal data set comparison transactions to be carried out within the scope of combating irregularities are determined by our Company.

Our company shares the personal data of its employees for the purpose of detecting irregular transactions only in the presence of one of the following conditions or similar conditions:

- It is legally obligatory to share the personal data of the relevant employee,
- There is a strong suspicion that it would not be possible to prevent or detect an offence if the employee's personal data were not shared,
- The employment contract of the relevant employee contains a provision regarding the sharing of personal data within this scope.

6.4 Processing of Personal Data of Employees in Company Mergers and Acquisitions and Other Transactions Changing the Company Structure

All transactions that change the company structure, including mergers and acquisitions, are evaluated under this section.

6.4.1 Sharing Personal Data of Employees for Changes in Company Structure

When our company needs to share the personal data of employees for the purpose of changing the company structure; first of all, it ensures that this personal data is anonymised and shared to the extent possible. For employee personal data that cannot be anonymised and shared, a commitment is obtained from the other party that it will only use this personal data limited to the transactions related to the change of company structure, that personal data will be protected in accordance with the data security provisions of the KVKK and will be processed in accordance with the relevant provisions of the KVKK, that personal data will not be transferred to third parties and that personal data will be deleted or destroyed after the relevant transactions are completed.

6.4.2 Providing Information

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If the information will not have any negative impact on the interests of our Company (for example, if the employee who learns that his/her personal data is shared within the framework of the company merger transaction affects the share prices of the company by using this information), employees are informed about which personal data are shared and for what purpose.

Employees are also informed about which of their personal data will be transferred to their new employers as a result of a change in company structure.

6.5 Processing Personal Data of Employees in Disciplinary Investigations

Our Company is obliged to comply with the obligations regarding the protection of personal data of employees during disciplinary investigations. In this context, especially the following actions are taken:

- Harmonisation of policies and procedures regarding disciplinary investigations with the obligations regarding the protection of personal data,
- Informing the persons authorised to conduct disciplinary investigations that personal data within the scope of disciplinary investigations can also be accessed within the scope of the right to access personal data of employees,
- Taking measures to ensure that personal data is not obtained through unlawful methods during disciplinary investigations,
- Ensuring that the personal data to be used during disciplinary investigations are accurate and up-to-date,
- Secure storage of personal data and records relating to disciplinary proceedings,
- Ensuring that unfounded allegations against employees are deleted from their files, unless there is a legal reason for not deleting them.

Our company prevents arbitrary access to the personal data of employees only due to the existence of a disciplinary investigation. In this context, the personal data of the employees cannot be accessed solely due to the disciplinary investigation if it is not appropriate for the purposes of obtaining personal data or if accessing personal data is considered a disproportionate action according to the seriousness

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of the subject of the investigation. Those conducting the investigation are informed by the PDP Committee before each investigation process about their authorisation to access the personal data of employees.

6.6 Processing of Personal Data Regarding Electronic Communication Transactions Performed by Employees in Connection with Business Activities

6.6.1 Determination of Policy on the Use of Electronic Communication Tools

If it is possible to supervise telephone, fax, e-mail, laptop, internet and similar electronic communication tools and means offered to employees by our company, a policy on the use of these electronic communication tools and means is determined and submitted to the information of the employees. This policy also includes the sanctions to be applied in case the employees act contrary to the determined rules.

If there are existing policies regarding the use of electronic communication tools, the compliance of these policies with the personal data protection legislation and other relevant legislation is evaluated; policies are revised to comply with the personal data protection legislation. Our company determines its own policies on the personal use of electronic communication tools.

If the use of electronic communication tools for personal purposes is permitted, the permitted personal use limits are determined and the employee is notified of these limits. It is important that employees are aware that the content of work-related communication can be audited at any time and that they are informed about this issue.

6.6.2 Processing of Personal Data Regarding the Use of Corporate Electronic Mail

Our company may process the personal data of employees related to the activities for the use of corporate e-mails. It is essential that employees are clearly informed about the scope and purpose of these personal data processing activities. In addition, a legal assessment is made regarding the legal nature and scope of these personal data processing activities.

6.6.3 Processing of Personal Data Regarding Internet Usage

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Our Company may impose restrictions on the use of the internet at the workplace and may inspect whether these restrictions are complied with. In the processing of personal data related to internet use, our Company clearly informs its employees about the personal data processing activities carried out within this scope.

If it is necessary to monitor internet usage in order to fulfil a legal obligation or if the relevant data processing meets another of the conditions specified in the KVKK, it is not necessary to obtain explicit consent from the employees. However, in case these personal data are processed for purposes other than the purposes based on the personal data processing conditions that are not subject to the consent of the personal data owner specified in the KVKK, explicit consent is also obtained from the employee.

6.6.4 Retention Period of Personal Data Processed Regarding Electronic Communication Transactions

Our Company determines which of the personal data regarding the electronic communication transactions carried out by the employees in connection with their business activities will be stored and the procedures regarding the storage period of this information. If there is no other obligation arising from the legislation, personal data processed for the purposes specified in this Policy may be stored for the duration of the employment contract and for the period of limitation required by the legal dispute that may arise according to the nature of the activity carried out from the end of the contract.

The retention period of the data is reviewed by taking into account the legal regulations authorising the retention of such data. This period may be extended in the presence of exceptional circumstances. If the period is extended, employees are informed about the extension, the reason and the types of personal data stored.

6.7 Security Camera Application at Workplace

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Our company can place security cameras at various points to ensure the security of workplaces. Care is taken to ensure that the image areas of these security cameras do not cover the entire workplace, but only areas with special risks, entrance - exit and similar areas.

Our company takes care to inform employees about the areas where security cameras are filmed, monitored by security cameras and the purposes of monitoring.

6.8 Tracking of Vehicles Provided by the Company

In cases where vehicles are allocated to employees by our company; the allocated vehicles may be tracked for determining the distance travelled, measuring fuel usage, obtaining location data and similar purposes. Employees are informed about this tracking in advance.

SECTION 7 - LEGAL RIGHTS OF EMPLOYEES REGARDING PERSONAL DATA COLLECTED ABOUT THEM

7.1 Legal Rights of Employees

Our employees have the following rights:

- (1) To learn whether personal data is processed or not,
- (2) Requesting information if personal data has been processed,
- (3) To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- (4) To know the third parties to whom personal data are transferred domestically or abroad,
- (5) To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data are transferred,
- (6) Although it has been processed in accordance with the provisions of the Law and other relevant laws, to request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- (7) To object to the emergence of a result to the detriment of the person himself/herself by analysing the processed data exclusively through automated systems,

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(8) In case of damage due to unlawful processing of personal data, to demand the compensation of the damage.

7.2 Principles for Employees to Exercise Their Legal Rights

You can send your requests regarding your rights under Article 11 of Law No. 6698 regulating the "Rights of the Relevant Person" and the application of the law to our address crewing@mantagas.com in writing or by using the registered electronic mail (KEP) address or the electronic mail address you have previously notified to our website and registered in our system or in accordance with other application procedures stipulated in the [Communiqué on Application Procedures and Principles to the Data Controller](#). We will finalise your request free of charge as soon as possible and within 30 (thirty) days at the latest - up to ten pages - depending on its nature.

SECTION 8 - SHARING PERSONAL DATA OF EMPLOYEES WITH THIRD PARTIES

Personal data and sensitive personal data may be transferred to third parties by taking necessary security measures in line with the purposes of processing.

8.1. Transfer of Personal Data

Personal data may be transferred to third parties in line with the purposes of data processing, if the data subject has explicit consent. If the employee candidate does not have explicit consent, personal data may be transferred to third parties in the presence of the following cases:

- If there is a clear regulation in the laws regarding the transfer of personal data,
- If it is mandatory for the protection of the life or physical integrity of the employee candidate or someone else, and if the personal data owner is unable to disclose his/her consent due to actual impossibility or if his/her consent is not legally valid;
- If it is necessary to transfer the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract,
- If personal data transfer is mandatory to fulfil a legal obligation of the Company,

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- If the personal data has been made public by the Candidate Employee,
- If personal data transfer is mandatory for the establishment, exercise or protection of a right,
- If personal data transfer is mandatory for the legitimate interests of the Company, provided that it does not harm the fundamental rights and freedoms of the employee candidate.

8.2 Transfer of Special Categories of Personal Data

Sensitive personal data of the employee candidate may be transferred to third parties in the following cases:

- With the explicit consent of the prospective employee or
- Without the explicit consent of the prospective employee;
 - ⇒ Personal data of special nature other than the health and sexual life of the prospective employee (race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, criminal convictions and security measures, and biometric and genetic data), in cases stipulated by law,
 - ⇒ Personal data of special nature relating to the health and sexual life of the prospective employee can only be transferred for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, and for processing by persons or authorised institutions and organisations under the obligation of confidentiality.

8.3 Third Parties to whom Personal Data are Transferred and Purposes of Transfer

Your personal data may be transferred to the categories of persons listed below:

- To the officers of the Company,
- Legally authorised public institutions and organisations,
- to legally authorised private law persons.

The scope of the above-mentioned persons to whom data is transferred and the purposes of data transfer are stated below.

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Persons to whom data can be transferred	Definition	Purpose of Data Transfer
Company Official	Company board members and other authorised real persons	In accordance with the provisions of the relevant legislation, limited to the design of strategies regarding the Company's commercial activities and for audit purposes
Legally Authorised Public Institutions and Organisations	Public institutions and organisations authorised to receive information and documents from the Company in accordance with the provisions of the relevant legislation	Limited to the purpose requested by the relevant public institutions and organisations within the legal authority
Legally Authorised Private Law Entities	Private law persons authorised to obtain information and documents from the Company in accordance with the provisions of the relevant legislation	Limited to the purpose requested by the relevant private law persons within their legal authority

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8.4 Transfer of Personal Data Abroad

Personal data may be transferred to foreign countries declared by the Board to have adequate protection or, in the absence of adequate protection, to foreign countries where the data controllers in Turkey and the relevant foreign country undertake in writing to provide adequate protection and where the Board has authorised such transfer.

8.4.1 Transfer of Personal Data Abroad

Personal data may be transferred abroad in the presence of the explicit consent of the prospective employee for the purposes of data processing or in the absence of the explicit consent of the prospective employee in the presence of one of the following cases:

- If there is a clear regulation in the laws regarding the transfer of personal data,
- If it is mandatory for the protection of the life or physical integrity of the employee candidate or someone else, and if the personal data owner is unable to disclose his/her consent due to actual impossibility or if his/her consent is not legally valid;
- If it is necessary to transfer the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract,
- If personal data transfer is mandatory to fulfil a legal obligation of the Company,
- If the personal data has been made public by the prospective employee,
- If personal data transfer is mandatory for the establishment, exercise or protection of a right,
- If personal data transfer is mandatory for the legitimate interests of the Company, provided that it does not harm the fundamental rights and freedoms of the employee candidate.

8.4.2. Transfer of Sensitive Personal Data Abroad

Sensitive personal data may be transferred abroad in the following cases:

- With the explicit consent of the prospective employee or
- Without the explicit consent of the prospective employee;

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- ⇒ Personal data of special nature other than the health and sexual life of the prospective employee (*race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, criminal convictions and security measures, and biometric and genetic data*), in cases stipulated by law,
- ⇒ Personal data of special nature relating to the health and sexual life of the prospective employee can only be transferred for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, by persons or authorised institutions and organisations under the obligation of confidentiality.

8.5. Information on Personal Data Sharing and Record Keeping

In case the personal data of the employees are shared with third parties, it is sought that the data sharing is based on one of the conditions specified in the KVKK before the data is shared. If the employees have not been informed before, it is ensured that they are informed about this sharing at the latest at the time of sharing. However, if this information creates a violation of the law or if it is a prior warning about an investigation by the competent authorities, the relevant employee is not informed about the subject.

Requests for external sharing of personal data of employees that are not routinely performed and the sharing made within this scope can be recorded by our Company. In this context, at least the person who approves the sharing, the person requesting the sharing, the reason for sharing, the date and time of sharing and the types of data shared are recorded. It is ensured that these records are regularly checked and examined.

8.6. Publication of Personal Data

Our company may only publish the personal data of employees by observing the following conditions:

- There is a legal right or obligation to publish personal data or the employee has given explicit consent for publication,

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- The personal data are not manifestly unfavourable.

Our company acts with an approach that balances the benefits to be obtained as a result of the publication of personal data and the expectations that the confidentiality of employees will be protected. In the event that the names of some employees and other personal data are published in media such as annual reports, publications or websites, these situations are specially evaluated and it is determined whether there is a need to obtain explicit consent. If it is concluded that explicit consent is required, the explicit consent of the relevant employees is obtained before the publication of personal data. During obtaining explicit consent, the types of personal data to be shared are notified to the employee one by one.

SECTION 9- STORAGE PERIOD OF EMPLOYEES' PERSONAL DATA

Our company keeps the personal data of the employees for the period required for the purpose for which they are processed and in accordance with the minimum periods stipulated in the legal legislation to which the relevant activity is subject.

In this context, our Company firstly determines whether a period of time is stipulated for the storage of personal data in the relevant legislation, and if a period is determined, it acts in accordance with this period. If there is no legal period, personal data are stored for the period required for the purpose for which they are processed.

Personal data are destroyed at the end of the specified retention periods in accordance with the periodic destruction periods or in accordance with the data owner's application and with the specified destruction methods (deletion and/or destruction and/or anonymisation).

SECTION 10 - USE OF EXTERNAL SERVICE PROVIDERS FOR THE PROCESSING OF PERSONAL DATA

Our Company may use external service providers for the processing of personal data of employees. However, our Company is obliged to take the following measures regarding external service providers:

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- Checking that the external service provider has taken the technical and administrative security measures required by the relevant legislation and sector practices,
- Periodically auditing that the external service provider has taken the technical and administrative security measures required by the relevant legislation and sector practices,
- Contracting with the external service provider, including the conditions for taking the necessary technical and administrative security measures,
- Taking necessary legal, administrative and technical measures in case personal data are sent to external service providers abroad.

SECTION 11 - SECURITY OF PERSONAL DATA

Our Company takes all reasonable measures to ensure the security of employee data. The measures taken are designed to prevent unauthorised access risks, accidental data loss, deliberate deletion of data or damage to data. Our Company appoints responsible employees within the company for personal data processing activities to be carried out specifically for the business activities of employees. In this context, the number of employees who will be responsible for the personal data processing activity of the employees and who will be authorised to access the personal data obtained as a result of this processing is kept as limited as possible. In this context, our Company remove or limit the access authorisations of these employees if there are employees whose access to this data is unnecessary in the current situation. Necessary physical security measures are taken to ensure that the personal data of employees are accessed only by persons authorised to access. In this context, it is also prevented that access authorised persons have unnecessarily broad authority.

Measures such as audit trails are taken to determine who accesses the personal data of employees on information systems. Access records to be created within this scope are regularly checked and investigation mechanisms are established for unauthorised access. It is essential that other employees who have access to the personal data of employees undergo the necessary security checks.

In addition, it is ensured that these persons sign a confidentiality agreement / undertaking that provides the necessary protections or include provisions in this context in their employment contracts and that these persons are continuously trained about their responsibilities. In the event that personal

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data belonging to employees are removed from the workplace by various means such as laptops, it is ensured that necessary security measures are taken and the relevant employees are informed about these measures.

SECTION 12 - PROCESSING OF PERSONAL DATA RELATING TO THE ACTIVITIES OF EMPLOYEES AT THE WORKPLACE

Under this section, the issues regarding which personal data can be processed (communication, vehicle use, etc.) and the principles to be followed by our Company in this regard are detailed.

12.1 Determining for which Purposes and in which Business Activities the Personal Data of Employees will be Processed

Our Company determines for which business activities and for which purposes employees process their personal data (such as e-mail control, use of vehicle tracking devices, camera surveillance) and determines the personal data processing methods that will be appropriate for the purposes of processing personal data and the desired result. Our Company ensures that the personal data processing purposes or methods to be carried out specific to the business activities of the employees comply with the personal data protection rules as a result of the evaluation to be carried out within their own structure.

Our Company informs its employees in charge of personal data processing activities to be carried out specifically for the business activities of the employees about the protection of personal data and other relevant legislation, the issues to be considered within the scope of the relevant legislation and the obligations of our Company arising from the legislation. Additional confidentiality and security obligations are added to the contracts made with employees who have access to personal data obtained as a result of these activities, or it is ensured that privacy policies / undertakings are signed by these persons.

12.2 Informing the Employees about the Personal Data Processing Activities of our Company related to their Business Activities

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Our company informs the employees about the kind of personal data processing activities (such as e-mail control, use of vehicle tracking devices, camera surveillance), the purposes and procedures of processing such personal data within the scope of the activities carried out in relation to the business.

If our company processes the personal data of the employee for the purposes of determining whether the employee acts in accordance with the work and workplace rules during working hours and whether the employee fulfils his/her duties duly and whether there are any actions that may disturb the peace and order in the workplace environment and for similar purposes, it must clearly and in detail inform the relevant employees.

12.3 Use of Personal Data Obtained as a Result of Processing Personal Data Related to Business Activities of Employees for Other Purposes

Personal data of employees processed in connection with their business activities may also be processed for other lawful purposes in accordance with the conditions specified in Article 5 of the KVKK and the principles of processing personal data stipulated in Article 4. Employees are also informed about these purposes by our Company through appropriate procedures.

12.4 Providing Employees with the Right to Defence Against Information Obtained as a Result of Processing Personal Data Related to Business Activities of Employees

Before a complaint procedure or disciplinary process is initiated against an employee on the basis of data obtained as a result of the processing of personal data relating to the business activities of employees, employees are given the right to see the data obtained, to make explanations about this data and to defend themselves.

SECTION 13 - CATEGORISATION OF PERSONAL DATA

Within the scope of this Policy, in addition to the personal data categorisations specified in the "Mantagas Denizcilik Personal Data Protection and Processing Policy" on the website www.mantagas.com the personal data of the employees in the following categories are processed.

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Personal Data Categorisation	Personal Data Categorisation Description
Identity Information	Data such as name-surname, national ID no, nationality, place of birth, date of birth, gender, and documents like a driver's license, ID card, or passport, as well as tax number, social security number, etc.
Employee	Personal data (including vehicle information, education information, marital status information, reference information) processed within the scope of activities carried out to ensure the commercial and legal security of the Company and employees during the employment of employees.
Employee Candidate Information	All kinds of personal data processed for obtaining information that will be the basis for the evaluation of employee candidates for the appropriate position in recruitment processes (including military service status information, education information, reference information).
Contact Details	Information such as telephone number, address, e-mail address, fax number
Physical Space and Security Information	Personal data related to the records and documents taken at the entrance to the physical space, during the stay in the physical space; camera records, records taken at the security point, etc.
Audio/Visual Information	Photographs and camera recordings (excluding recordings within the scope of Physical Space Security Information), voice recordings and data contained in documents that are copies of documents containing personal data
Personal Information	All kinds of personal data processed for obtaining information that will be the basis for the personal rights of employee candidates

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Personal Information of a special nature	Data relating to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data
Benefits and Benefits Information	Personal data (including insurance information) processed within the scope of activities carried out for the purpose of planning the fringe benefits and benefits offered to employees, determining objective criteria for entitlement to them and ensuring entitlement to them, and employee satisfaction and loyalty.
Performance and Career Development Information	Personal data processed for the purpose of measuring the performance of our Company's employees and planning and execution of their career development within the scope of our Company's human resources policy and auditing of such activities.
Request / Complaint Method Information	Personal data relating to the receipt and evaluation of any request or complaint addressed to our Company, which clearly belongs to an identified or identifiable natural person, processed partially or completely automatically or non-automatically as part of the data recording system