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## INTEGRATED MANAGEMENT SYSTEM MANUAL

Chapter 06

**KV 012** 

**CLARIFICATION TEXT** 

Issue No.: 01

Issue Date: 01/10/2024

Rev. No.: -

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## **CLARIFICATION TEXT**

As Mantagas Denizcilik ve Ticaret Limited Şirketi ("Mantagas Denizcilik" or "Company"), we prioritize ensuring the security of personal data for individuals to whom we provide services. Your personal data is collected, stored, transferred, and protected in accordance with the basic principles and data processing conditions outlined in Law No. 6698 on the Protection of Personal Data ("Law"). We would like to inform you regarding the processing of your personal data for this purpose.

Detailed information about the purposes for which your personal data is processed by our Company can be found in the "Mantagas Personal Data Protection and Processing Policy" located at the <a href="https://www.mantagas.com">www.mantagas.com</a> website address.

### 1. Data Controller

Mantagas Denizcilik ve Ticaret Limited Şirketi processes your personal data in the capacity of "Data Controller" as defined in Article 3 of the Law. The details of our Company are as follows:

Trade Name: MANTAGAS DENIZCILIK VE TICARET LIMITED SIRKETI

Tax Office & Tax No: USKUDAR V.D. / 6121534720

Address: SALACAK MAH. SALACAK ISKELE CAD. NO: 18 USKUDAR/ISTANBUL

Mail: <a href="mailto:crewing@mantagas.com">crewing@mantagas.com</a>
Tel: +90 216 201 10 21/22/23

### 2. Purposes of Processing Personal Data

Your personal data may vary depending on the service provided by our Company and the commercial activities of our Company; it can be collected verbally, in writing, or electronically through Company units and offices, websites, social media platforms, mobile applications, and similar means, either automatically or non-automatically.

Your personal data and/or special category personal data may be processed for the following purposes:

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Our company collects data from the following parties who have a business relationship with us, as outlined in the Law. These are:

- Employees and employee candidates,
- Family members and relatives of employees and employee candidates,
- Our customers,
- Our suppliers,
- Our consultants,
- Our business partners,
- Our company executives,
- Our company's legal representatives,
- Individuals in contractual relationship with the Company,
- Individuals subject to legal proceedings,
- Our visitors.

Under Articles 5 and 6 of the Law on the Protection of Personal Data, our Company collects and processes the following data. These include:

- Name, surname, phone number, email address information,
- Personal and special category data obtained within the scope of human resources,
- Education and training information,
- Employment information,
- Information related to request/complaint management,
- Information related to legal affairs,
- Information regarding compliance with ethical values and the law,
- Financial information,
- Audit information,
- Information on the use of electronic media,
- Information related to goods and services provided or received,
- Business activity information,
- Information regarding trade and other licenses and permits,
- Visual and auditory information (photograph, camera),
- Telecommunications records,

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- Email and information systems service usage records,
- Entry records,
- · Health reports and health information,
- Biometric data,
- Criminal record information.

In accordance with Articles 5 and 6 of the Law on the Protection of Personal Data, we collect and process data for the following company purposes, limited to the relevant objectives. These include:

- The execution of accreditation and ministry authorization processes,
- The execution of our Company's commercial activities,
- Fulfillment of work processes related to its commercial activities,
- Management and execution of relationships with business partners and/or suppliers,
- Technical management of our Company's websites,
- Planning and execution of sales, marketing, and after-sales processes of services,
- Providing information on the contents of services,
- Sending commercial electronic messages with additional consent, as per legal regulations,
- The execution of educational events and other organizations,
- The management and assurance of legal and commercial relationships with individuals who
  have a business relationship with our Company,
- Execution of administrative operations related to communication,
- Employee management and administration,
- Ensuring and monitoring the physical security of company locations,
- Monitoring contract processes and/or legal requests,
- Planning and execution of human resources and recruitment processes, as well as training and educational activities,
- Planning and/or execution of occupational health and safety processes,
- Planning and execution of corporate communication and corporate governance activities,
- Execution of information security management services,
- Tracking and auditing of finance and/or accounting activities, and the identification of clients' financial risks,
- Determining and implementing our Company's commercial and business strategies,

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- The creation and tracking of visitor records,
- Additional purposes or purposes that will be notified to the data subject at the time of obtaining information,
- Fulfilling legal obligations as required or mandatory under the relevant legislation,
- Providing and executing training services to Company employees and third parties,
- Monitoring and execution of oversight and audit services in accordance with the Company's objectives,
- Provision of certification services to the service recipient

### 3. Transfer of Processed Personal Data

In line with the fulfillment of the above-mentioned purposes, your personal data collected may be transferred to Company suppliers, as well as legally authorized public institutions and legally authorized private persons, as part of the performance of legal obligations and explicitly stipulated by law.

### 4. Method and Legal Basis for Collecting Personal Data

Your personal data is obtained in any verbal, written, or electronic environment for the purpose of providing the products and services we offer within the determined legal framework and ensuring that the responsibilities arising from the contract and the law are fulfilled correctly and completely by our Company. Based on this legal reason, your personal data may be processed and transferred for the purposes specified in the 2nd article of this text, in accordance with the personal data processing conditions and purposes specified in Articles 5 and 6 of the KVKK.

### 5. Rights of the Personal Data Owner under Article 11 of the Law

As the owner of personal data, we inform you that you have the following rights under Article 11 of the Law:

- To learn whether your personal data is processed or not,
- To request information regarding the processing if your personal data has been processed,
- To learn the purpose of processing your personal data and whether it is used in accordance with the purpose,
- To know the third parties, both domestic and abroad, to whom personal data is transferred,



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- To request the correction of incomplete or inaccurate personal data, if any,
- To request the deletion or destruction of personal data under the conditions set forth in the relevant legislation,
- To request notification of correction, deletion, or destruction to third parties to whom your personal data has been transferred,
- To object to the occurrence of a result against you by analyzing the processed data exclusively through automated systems,
- To demand compensation if you suffer damage due to the unlawful processing of personal data

You can submit your requests regarding your rights, set out in Article 11 of the Law regulating the "Rights of the Relevant Person," either in writing or by using your registered electronic mail (KEP) address, your electronic mail address previously notified to our Company, or by other methods stipulated in the Communiqué on the Procedures and Principles of Application to the Data Controller to the address <a href="mailto:crewing@mantagas.com">crewing@mantagas.com</a>. We will conclude your request free of charge, depending on the nature of your request, as soon as possible and within 30 (thirty) days at the latest, up to ten pages.