

MİKROELEKTRONİK ARAŞTIRMA GELİŞTİRME TASARIM VE TİCARET LİMİTED ŞİRKETİ

PERSONAL DATA PROTECTION AND PROCESSING POLICY

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1. Introduction

Mikroelektronik Araştırma Geliştirme Tasarım ve Ticaret Limited Şirketi (“MKR-IC”) attaches the utmost importance to the lawful processing and protection of personal data pursuant to the Personal Data Protection Law No. 6698 (“Law”). Therefore, great importance is attached to the protection of your personal data throughout all planning and activities carried out by MKR-IC.

Within this scope, and with full awareness of our responsibilities, your personal data are protected in accordance with this Personal Data Protection and Processing Policy (“Policy”).

1.1. Purpose

The principal purpose of this Policy is to provide explanations regarding the systems for the processing and protection of personal data in accordance with the law and the purpose of the Law, and, within this scope, to inform individuals whose personal data are processed by MKR-IC.

Accordingly, the Policy aims to ensure full compliance with the legislation in MKR-IC’s personal data processing and protection activities and to safeguard all rights granted under the personal data protection legislation.

1.2. Entry into Force of the Policy

The most up-to-date version of the Policy is published on MKR-IC’s website at www.mkr-ic.com/KVK. MKR-IC reserves the right to make amendments to this Policy. www.mkr-ic.com/KVK

1.3. Scope of the Policy

This Policy has been prepared for individuals whose personal data are processed by MKR-IC by automated means or by non-automated means, provided that such processing forms part of a data recording system.

Job Applicant: Individuals who have applied for a position at MKR-IC by any means or who have submitted their curriculum vitae and related information to MKR-IC.

Intern / Intern Applicant: Individuals who have applied for an internship at MKR-IC by any means or who have submitted their curriculum vitae and related information to MKR-IC.

MKR-IC Customer or Prospective Customer: Natural persons who use, have used, or request to use the products or services offered by MKR-IC.

Visitor: All natural persons who visit MKR-IC’s office or website for any purpose.

Third Party: Other natural persons who do not fall within any of the categories of individuals covered by this Policy.

1.4. Implementation of the Policy

This Policy has been prepared to set out and make concrete, for MKR-IC practices, the rules established under the applicable legislation.

2. Processing and Transfer of Personal Data

2.1. General Principles for the Processing of Personal Data and Special Categories of Personal Data

Personal data are processed by MKR-IC in accordance with the procedures and principles set out in the Law and this Policy. When processing personal data, MKR-IC acts in accordance with the principles listed in the Law.

2.2. Conditions for Processing Personal Data and Special Categories of Personal Data

MKR-IC processes personal data in accordance with the conditions specified in the Law. MKR-IC takes the measures determined by the Personal Data Protection Authority.

2.3. Conditions for the Domestic and International Transfer of Personal Data

MKR-IC acts in accordance with the conditions and principles set out in the Law regarding the transfer of personal data. By taking the necessary security measures in line with the purposes of processing, MKR-IC may transfer all personal data, including special categories of personal data, to third parties in accordance with the Law.

3. Categories of Personal Data, Purposes of Processing and Transfer, and Recipients of Personal Data

3.1. Categories of Personal Data

The personal data specified below are processed by MKR-IC in accordance with the conditions for processing personal data set out in the Law.

Personal Data Category	Scope
Identity Information	Data that clearly belong to an identified or identifiable natural person and are processed wholly or partly by automated means or by non-automated means as part of a data recording system; data containing information relating to the individual's identity, including information such as full name, Turkish Republic identity number, nationality information, mother's name, father's name, place of birth, date of birth, and gender; documents such as a driver's licence, identity card, or passport containing such information; and information such as tax number, Social Security Institution number, signature or electronic signature information, and vehicle licence plate number.
Contact Information	Data that clearly belong to an identified or identifiable natural person and are processed wholly or partly by automated means or by non-automated means as part of a data recording system, including telephone number, address, e-mail address, fax number, and IP address.

Location Information	Data that clearly belong to an identified or identifiable natural person and are processed wholly or partly by automated means or by non-automated means as part of a data recording system, including GPS location information, travel data, and similar information identifying the location of the individual within the scope of business and transactions carried out by MKR-IC.
Personnel Information	Any personal data that clearly belong to an identified or identifiable natural person and are processed wholly or partly by automated means or by non-automated means as part of a data recording system, for the purpose of obtaining information that will form the basis for the establishment of personnel rights of natural persons in an employment relationship with MKR-IC.
Legal Transaction Information	Personal data processed within the scope of determining all of MKR-IC's legal rights and fulfilling its legal obligations.
Physical Premises Security Information	Data that clearly belong to an identified or identifiable natural person and are processed wholly or partly by automated means or by non-automated means as part of a data recording system, including camera recordings, fingerprint records, and records taken at security points relating to entry into physical premises and presence within such premises.
Transaction Security Information	Personal data processed in relation to the technical, administrative, financial, legal, or commercial security of the individual or MKR-IC.
Financial Information	Data that clearly belong to an identified or identifiable natural person and are processed wholly or partly by automated means or by non-automated means as part of a data recording system; personal data relating to information, documents, and records showing any financial outcome created according to the type of legal relationship established between MKR-IC and the individual, including customer number and IBAN.
Professional Experience Information	Data that clearly belong to an identified or identifiable natural person and are processed wholly or partly by automated means or by non-automated means as part of a data recording system; data containing information concerning the individual's professional experience, including diploma information, courses attended, in-service training information, certificates, and transcripts.
Visual or Audio Information	Data that clearly belong to an identified or identifiable natural person, including photographs, camera or audio recordings, and data contained in documents that constitute copies of documents containing personal data.
Special Categories of Personal Data	Data that clearly belong to an identified or identifiable natural person and are processed wholly or partly by automated means or by non-automated means as part of a data recording system, as specified in Article 6 of the Law.
Job Applicant Information	Data relating to individuals who have applied for a position at MKR-IC.
Intern Information	Data relating to individuals who have applied to participate in an internship program at MKR-IC.

3.2. Purposes of Processing and Transfer of Personal Data

Personal data are processed by MKR-IC, in accordance with the principles and conditions set out in the Law, for the following purposes, which are not limited to those listed below:

- Planning human resources processes;
- Fulfilling obligations arising from employment contracts and legislation;
- Managing assignment processes;
- Conducting activities in compliance with legislation;
- Managing contract processes;
- Managing fringe benefits and benefits processes;
- Conducting and auditing business activities;
- Carrying out occupational health and safety activities;
- Providing information to authorized persons, institutions, and organizations;
- Carrying out payroll activities accurately and completely;
- Carrying out communication activities;
- Following up legal matters;
- Conducting finance and accounting activities;
- Internship and vocational training activities.

4. Method and Legal Basis for Collecting Personal Data, Destruction Process, and Retention Period

4.1. Method and Legal Basis for Collecting Personal Data

Personal data are collected and processed by MKR-IC by various means, including MKR-IC's website, in all forms of verbal, written, and electronic media, for the purpose of achieving the purposes set out in this Policy or in accordance with legal rights and obligations.

4.2. Destruction of Personal Data

Even where MKR-IC has processed personal data in compliance with the Personal Data Protection Law and other provisions of applicable legislation, MKR-IC shall erase, destroy, or anonymize personal data ex officio or upon the request of the relevant individual, in accordance with the principles and conditions specified in the Law, where the reasons requiring the processing of such data cease to exist.

The procedures and principles governing the destruction of personal data are set out in the Personal Data Retention and Destruction Policy.

4.3. Retention Period of Personal Data

MKR-IC retains personal data for the periods prescribed by legal regulations or, where no such period exists, for the period to be determined in accordance with the activities it carries out. Upon expiry of the relevant period, such data shall be destroyed by MKR-IC.

The procedures and principles regarding the retention periods of personal data are set out in the Personal Data Retention and Destruction Policy.

5. Protection of Personal Data

Personal data are protected by MKR-IC in accordance with the conditions and principles specified in the Law. MKR-IC takes the necessary technical and administrative measures, and carries out the necessary audits within this scope, to ensure an appropriate level of security in order to prevent the unlawful processing of and access to personal data and to ensure the preservation of such data.

Where personal data are unlawfully obtained by third parties, MKR-IC acts in accordance with the procedures set out in the Law.

6. Rights of Individuals, Exercise of Rights, and Evaluation of Requests

6.1. Informing Individuals

MKR-IC informs individuals whose personal data it processes, in accordance with the procedures and principles specified in the Law, regarding the purpose, method, and principles of processing their personal data, as well as the retention and destruction of such data.

The MKR-IC Personal Data Processing Disclosure Notice is available at www.mkr-ic.com/KVK.

6.2. Rights Set Out in the Law

The disclosure provided by MKR-IC regarding the purpose, method, and principles of processing personal data, as well as its retention and destruction, also includes the rights granted under the Law.

6.3. Exercising Rights

Pursuant to Article 13(1) of the Law, titled “Application to the Data Controller,” you may submit all your requests to MKR-IC in writing or by other methods determined by the Personal Data Protection Authority. The channels and procedures for submitting an application to MKR-IC are explained below.

To exercise your rights, you may complete the form available at www.mkr-ic.com/KVK and submit your request, which must contain the information necessary to identify you clearly and your explanations regarding the right under Article 11 of the Law that you wish to exercise, using one of the following methods:

- Sending a signed copy of the form to kvk@mkr-ic.com;
- Delivering the form in person, together with documents verifying your identity, to Mikroelektronik Araştırma Geliştirme Tasarım ve Ticaret Ltd. Şti., Reşitpaşa Mah. Katar Cad. 4, ARI 3 Teknokent B203, 34467 Sarıyer / İstanbul, Türkiye;
- Sending the form through a notary public or by other methods specified in the Personal Data Protection Law No. 6698; or
- Sending the relevant form, signed with a secure electronic signature, to MKR-IC’s Registered Electronic Mail (“KEP”) address: mikroelektronik@hs03.kep.tr.

6.4. Procedure and Time Limit for MKR-IC to Respond to Applications

MKR-IC will conclude the requests included in an application free of charge as soon as possible and, depending on the nature of the request, no later than thirty days. Where the requested action requires an

additional cost, the fee specified in the tariff determined by the Personal Data Protection Authority may be charged.

MKR-IC may accept or reject the request, stating the reasons for any rejection, and shall notify its response in writing or electronically. Where the request included in the application is accepted, MKR-IC shall fulfill the requirements of the request.

6.5. Right to Lodge a Complaint with the Personal Data Protection Authority

Where an application is rejected, the response is considered insufficient, or no response is provided within the prescribed period, the applicant may lodge a complaint with the Personal Data Protection Authority within thirty days from the date on which the response is received, and in any event within sixty days from the date of application.

6.6. Updates, Compliance, and Amendments

MKR-IC reserves the right to make amendments to this Policy and to other policies that are attached to or associated with this Policy.