

* +We would like to remind you that any special personal data (e.g. information on religion, health, blood type, political and philosophical belief, etc.) should not partake within the context of the information and documentation you share through the web site.

CLARIFICATION TEXT REGARDING PROCESSING OF PERSONAL DATA

According to 6698 numbered Law on the Protection of Personal Data (“LPPD”), as the Data Accountable, with our obligation to inform you within the scope of LPPD; as Vig Metal Sanayi ve Ticaret Anonim Sirketi (“**Company**” or “**Vig Metal**”); we would like to give you information with the Clarification Text Regarding Processing of Personal Data (“**Clarification Text**”) regarding collection methods of your Personal Data identified below and the legal reasons, our methods and policies on protection of your Personal Data, examples of processed Personal Data, identification of the data accountable, purpose for processing Personal Data, transfer of your Personal Data to third parties and/or abroad, and the rights given to you within the scope of LPPD.

Within the scope of LPPD, personal data implies all kinds of information (“Personal Data”) related to a real entity who has a specific or specifiable identification, and Sensitive Personal Data which is a specific type of this, on the other hand, implies data related to race, ethnicity, political opinion, philosophical belief, religion, sect, or other beliefs, appearance, membership to an association, foundation or a union, health, sexual life, conviction, and data related to security measures and biometric and genetic data (“**Sensitive Personal Data**”). In this respect definition of Personal Data comprises your Sensitive Personal Data also.

1. *Collection Method of your Personal Data and Legal Reasons*

The Company acts accordingly to all the obligations required in the related regulations, mainly in LPPD, in all the Personal Data processing activities it is conducting and is taking security measures necessary to safely keep your Personal Data, prevent unlawful usage of your Personal Data.

You can find our policy regarding protection of your Personal Data in our web site. Personal Data processes indicated in this hereby Clarification Text are conducted in accordance with the LPPD, the related regulation, and Vig Metal Personal Data Protection Policy.

The company does not conduct direct sales to the end consumer and, in this respect, does not actualize marketing activities through electronic commercial message sending, mailing or similar ways by using your contact addresses it has obtained through its corporate web site or other ways explained in detail below. Only mandatory cookies are used during the visits you have made to the Company’s corporate web sites and cookies for marketing purposes are not used.

As required by LPPD, we collect your Personal Data automatically or manually in verbal, written or electronic methods through channels mentioned below and other channels which may be added to these in the future; and, in accordance with LPPD, provided that it is i) of legitimate interest of the data accountable, ii) mandatory to process data for establishment, usage or protection of a right, iii) directly related to establishment or execution of a contract; we process personal data belonging to parties of the contract which are necessary to be processed within the scope of personal data processing terms (legal reasons):

- Primarily the pages below but not only limited to them through our <https://www.vigmetal.com.tr/> and <http://www.viggroupp.com.tr/> addressed internet sites (“**Internet Sites**”), and all other on-line channels (“**Media Tools**”) belonging to the Company and/or one Group Company electronically through automated or non-automated ways,
- Verbal, written or electronically through automated or non-automated ways by means of channels belonging to the Company or business channels under the control of the Company,
- Through all kinds of communication tools (“**Communication Tools**”) channel by means of other communication methods including correspondence conducted through our e-mail addresses, short messages (“**SMS**”) sent with other purposes regarding Company activities, or multi-media messages (“**MMS**”),

- Through automated or non-automated means, verbally, written or electronically, within the scope of sales, marketing, and after sales services, through all the service, sales and marketing network channels which belong to the Company or established or operated by third parties instead of operating within the company,
- Through automated or non-automated means, verbally, written or electronically by means of all activities realized and/or sponsored by the Company or the Group Companies, but not just limited to them,
- Through automated or non-automated means, verbally, written or electronically through third parties like the Group Companies the Company provides to or receives service from, business partners, manufacturers, or companies providing service/product,
- Through automated or non-automated means, verbally or electronically by yourself through your internet site, social media or other channels you disclose your Personal Data.

2. Identification of the Data Accountable

Regarding your Personal Data you shared through the channels mentioned above, the Data Accountable is Vig Metal Sanayi ve Ticaret Incorporated Company.

3. Objectives for Processing Your Personal Data as the Data Accountable

Your Personal Data, collected from the channels mentioned in this hereby Clarification Text with the mentioned methods are processed by the Company within the scope of below objectives:

(a) Within the scope of LPPD Article 5.2 and Article 6.3;

As a rule, we process your Personal Data based on your explicit consent. However, in exceptional circumstances permitted within the scope of LPPD, your Personal Data will be processed without your explicit consent in line with legal reasons regulated in LPPD Article 5/2:

- Fulfilling our legal and judicial obligations within the scope of the related regulation,
- Carrying out customer relations management processes, following up of demands / complaints,
- Establishment and execution of our commercial relation and the contract between us,
- Carrying out finance and accounting transactions, keeping financial records within the scope of tax and commercial law;
- Carrying out Product / Service Production and Operation Processes, carrying out product and service loyalty processes(planning and carrying out activities necessary for publicizing our products and services, being in contact for publicizing our products and services, carrying out corporate communication activities),
- Receiving your questions and complaints, to be able to reply back to you,
- Carrying out product / service sales processes, carrying out product / service procurement processes, ensuring communication during our commercial relation, processing contact information of our employees and representatives who get in contact with us in this respect,
- Planning and carrying out business strategies of our Company, improving our products and services,
- Effective usage of resources, observing and evaluating quality of our services, ensuring safety and efficiency of our Company's operations such as ensuring your safety,
- Usage of our right of defense in case it is needed and for protection of our Company's or our affiliates', your or third parties' rights, safety, ownerships and operations,
- Ensuring judicial, technical and commercial-business safety of related entities that are in business relations with our Company,
- Replying to demands or communication subjects of official authorities,
- Conforming to workplace health supervision and audit obligations,
- After your participation to our activities that contain warning about existence of photograph or video recording, usage of the photographs in the activity in news and our internet sites, social media channels after the activity,
- Processing of your personal data disclosed on your internet site or other channels.

4. Processing Period of your Personal Data

Personal Data you have shared through the channels mentioned in this hereby Clarification Text shall be processed in accordance with the periods required by the regulation related to protection of Personal Data, with LPPD being primary, and the other regulation, in any case as long as the above legitimate objectives are not abolished.

5. *Transferring your Personal Data to Third Parties and/or Out of the Country*

The Company may transfer your Personal Data collected from the channels mentioned in this hereby Clarification Text through the mentioned methods to receiving groups indicated below within and/or outside of the country in line with the objective or objectives indicated in the "Objectives for Processing Your Personal Data" titled part of this hereby Clarification Text within the frame of personal data transfer conditions indicated in the scope of LPPD Article 8 and Article 9:


- To our Group Companies receiving or giving service as long needed for our commercial activities,
- To business partners, vendors, banks, finance establishments, consultancy companies giving support on law, tax, etc. similar fields,
- To third parties we get support on areas like warehousing, archiving, information technologies support (server, hosting, program, cloud data processing, etc.), security, call center,
- To our subcontractors and service providers who perform on behalf of our company within the frame of our services,
- To authorized institutions and establishments and other related parties transfer is necessary to fulfill legal or regulatory obligations or demands,
- In case of possible joint venture/acquisition/reorganization process, to related third parties only as much as it is related to the process

6. *Access to Your Personal Data and Your Rights within the Scope of LPPD*

In accordance with LPPD article 11, by appealing to the Company, you have the right to;

- (a) Learn whether your Personal Data have been processed,
- (b) Demand information if your Personal Date have been processed,
- (c) Learn the reason for processing of your Personal Data and whether they are used according to the purpose,
- (d) To know the third parties your Personal data have been transferred to within or outside the Country,
- (e) In case your Personal Data have been processed insufficiently or incorrectly, to demand to have them corrected,
- (f) In case the circumstances that needed processing of your Personal Data have been abolished, demanding their deletion or elimination. Your demand shall be evaluated within the objective, period and legitimacy principles,
- (g) In case your Personal Data is updated, deleted or eliminated, to request these transactions be informed to the third parties Personal Data have been transferred to,
- (h) In the event your Personal Data have been analyzed exclusively through automatic systems, to object to the result in case the conclusion has resulted against you,
- (i) In case your Personal Data have been processed illegally and you have suffered a loss due to this, to demand compensation of the loss.

In this respect, you can deliver your demand regarding your rights by filling out the form on our Internet Site or by sending an e-mail from your e-mail address that has been previously registered in our system (please check your registered e-mail address in our system) to our e-mail address indicated below which may change time to time by writing your own demand and making sure it carries the conditions determined by the Personal Data Protection Institution, or to our rep address with a secure electronic signature or mobile signature, or you can hand deliver or send by notary a signed original petition to our below indicated postal address which may change time to time or you can send it in the future through other methods that may be determined and added by the Personal Data Protection Institution. Please confirm current application methods from the regulation prior to your application. The Company, according to qualification of the demand, shall conclude the demand as earliest as possible and latest within 30 (thirty) days free of charge. In case a separate cost arises related to concluding of the demands by the Company, fees on the list determined by the Personal Data Protection Institution may be demanded by the Company.

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