



BORSAN KABLO ELEKTRİK
AYDINLATMA A.Ş.

ENTEĞRE YÖNETİM SİSTEMİ

Doküman No

İlk Yay.
Tarihi

Rev. No

Rev. Tarihi

S.No

FTG.KVKK.001.72

10.07.2024

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10.07.2024

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6698 NUMBERED LAW ON THE PROTECTION OF PERSONAL DATA SUSTAINABILITY REPORT

LAW NO. 6698 ON THE PROTECTION OF PERSONAL DATA CLARIFICATION TEXT

This disclosure text has been prepared by Borsan Kablo Elektrik Aydınlatma İnşaat Sanayi ve Ticaret A.Ş., which is the data controller in the context of the Sustainability Report Materiality Analysis Survey, in order to fulfil the disclosure obligation in accordance with Article 10 of the Personal Data Protection Law No.

6698. Dear Business Partners,

Our Purposes of Processing Your Personal Data, Legal Reasons and Collection Methods:

PURPOSE	DATA CATEGORY	DATA
Execution of Information Security Processes	Identity Information	Name and Surname, Title
	Contact Information	Company Name, Telephone No, Address, E-mail, Country, Department
	Risk Management Information	Survey Questions; Emission Management, Energy Management, Use of Renewable Energy Resources, Waste Management, Circular Economy, Water Management, Water Pollution Control, Protection of Biodiversity, Human Rights, Inclusion, Diversity and Equality, Gender Equality, Employee Health and Safety, Employee Loyalty and Satisfaction, Talent and Career Management, Contribution to Local Economy, Training and Development, Supply Chain Management, Customer Satisfaction, Sustainable Purchasing, Ethics, Transparency and Compliance, Risk and Opportunity Management, Board of Directors Diversity, Compliance with National and International Standards / Legislation, Information Security and Cyber Risk Management, Innovation and Digitalisation, Strong Financial Management and Economic Performance, Stakeholder Communication, Brand Reputation and Management, Responsible Marketing, Report Results, During data deletion processes, "Date of Deleted Data, Place of Destruction, Place of Destruction, Period, Reason for Destruction, Method of Destruction", Date, Day Date of Destruction, Place of Destruction, Period to which it belongs, Reason for Destruction, Method of Destruction", Date, Day
Our legal grounds stated in Article 5 of the Law: "5.2.a It is clearly stipulated in the laws. 5.2.ç It is mandatory for the data controller to fulfil its legal obligation. 5.2.f It is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.		
Collection method: We collect your personal data digitally from our e-mail communication with our company employees who have passed the data security audit and from the backup of the records.		
Conducting Audit / Ethics Activities	Identity Information	Name and Surname, Title
	Contact Information	Company Name, Telephone No, Address, E-mail, Country, Department
	Risk Management Information	Survey Questions; Emission Management, Energy Management, Use of Renewable Energy Resources, Waste Management, Circular Economy, Water Management, Water Pollution Control, Protection of Biodiversity, Human Rights, Inclusion, Diversity



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		and Equality, Gender Equality, Employee Health and Safety, Employee Loyalty and Satisfaction, Talent and Career Management, Contribution to Local Economy, Training and Development, Supply Chain Management, Customer Satisfaction, Sustainable Procurement, Ethics, Transparency and Compliance, Risk and Opportunity Management, Board Diversity, Compliance with National and International Standards / Legislation, Information Security and Cyber Risk Management, Innovation and Digitalisation, Strong Financial Management and Economic Performance, Stakeholder Communication, Brand Reputation and Management, Responsible Marketing, Report Results
Our legal grounds as set out in Article 5 of the Law: “5.2.f Provided that it does not harm the fundamental rights and freedoms of the data subject, it is mandatory to process data for the legitimate interests of the data controller.		
Collection method: We collect your personal data digitally through the Sustainability Report Materiality Analysis Survey and the evaluation of the survey results.		
Execution of Communication Activities	Identity Information	Name Surname
	Contact Information	Company Name, Telephone No, Address, E-mail
Our legal grounds stated in Article 5 of the Law : “5.2.f Provided that it does not harm the fundamental rights and freedoms of the data subject, we process the data limited to the legal reasons "data processing is mandatory for the legitimate interests of the data controller".		
Collection method: We collect your personal data digitally during e-mail communication within business processes.		
Ensuring the Security of Data Controller Operations	Identity Information	Name and Surname
	Contact Information	Company Name, Telephone No, E-mail
	Risk Yönetimi Bilgileri	During data deletion operations, "Destruction Date, Destruction Place, Period, Destruction Reason, Destruction Method of the Deleted Data", Date, Day
Our legal reasons stated in Article 5 of the Law: “5.2.a It is clearly stipulated in the laws. 5.2.ç It is mandatory for the data controller to fulfil its legal obligation." limited to the legal reason .		
Our collection method: We collect your personal data digitally through documents prepared in accordance with the law on the protection of personal data and through our data deletion operations.		

We collect your personal data, the purpose and legal reasons of which are detailed above, by non-automatic methods, provided that they are part of the data recording system.

With whom and for what purpose we share your personal data:

- With an overseas Firewall Software Company for the execution of information security processes,
- We share information security, communication, storage and archive activities with Microsoft Office 365, from which we receive overseas e-mail service.
- Survey results are shared cumulatively with the Contracted Consultant Company, your personal data is not shared.

As a data owner, you have the rights specified in Article 11 of the Law No. 6698 on the Protection of Personal Data. You can use the communication channels specified under the Request and Application heading below to exercise your rights and for your requests.



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For your requests and applications:

By filling out the KVKK Information Request form on <https://www.borsan.com.tr/kisisel-verilerin-korunmasi-kanunu/>, by sending an e-mail to borsan@hs01.kep.tr, borsan@hs03.kep.tr or kvkk@borsan.com.tr, by calling +90 (362) 266 59 25, by sending a petition by mail to OSB Organize Sanayi Bulvarı No: 40-1 Tekkeköy/SAMSUN or by hand delivery.

Within 30 days at the latest after we receive your request, you will be informed by returning to you through the channels specified here. You do not have to pay a fee for these transactions. We reserve the right to charge a fee in the following cases.

1. If you request a written response to your petition, you do not have to pay a fee for up to ten pages. For each page over 10 pages, a transaction fee of 1 Turkish Lira may be charged.
2. If the response to the application is given in a recording medium such as CD, DVD, flash memory, the fee that may be requested by the data controller cannot exceed the cost of the recording medium.
3. If you request delivery by international cargo, you are required to cover the shipping costs.

If there is a change in the legal legislation and/or Borsan Kablo Elektrik Aydınlatma İnşaat Sanayi ve Ticaret A.Ş.'s Personal Data Storage and Destruction Policy, necessary changes will be made in this Clarification Text.

Date entered into force: 01.07.2024