



**ALDRIDGE MİNERAL MADENCİLİK LTD.ŞTİ**  
**POLICY ON PROCESSING AND PROTECTION OF**  
**PERSONAL DATA**  
**WITHIN THE SCOPE OF LAW NO 6698**



## 1. INTRODUCTION

### 1.1 Purpose and Execution of Policy

Turkish Personal Data Protection Law No. 6698 (“**Law**”) entered into force on 7 April 2016; accordingly, this Aldridge Mineral Madencilik Ltd. Şti. Policy On Processing And Protection of Personal Data (“**Policy**”) aims to ensure that Aldridge Mineral Mining Limited Company (“**Company**”) is compliant with the Law and to determine the principles to be followed in the fulfillment of the obligations related to the protection and processing of personal data being processed by the Company during the use of the web site [<http://www.aldridge.com.tr/>] (“**Web Site**”), provided and operated by the Company.

The policy sets out the conditions for the processing of personal data and outlines the main principles adopted by the company in the processing of personal data. In this context, the Policy covers all personal data processing activities carried out by the Company within the scope of the Law, the rights of personal data owners with respect to all data processed and all personal data processed by the Company.

Use of the Web Site shall mean that this Policy has been read, understood and acknowledged. In the event that you do not acknowledge any of the rules set out hereunder, please stop using the Web Site immediately.

In case of any link to a Web Site or application or similar sites, owned by any third party, is provided through the Web Site, then, the web sites, applications and similar sites accessed by means of such links shall be outside the scope of this Policy. In any such case, the privacy policy to be applicable for the respective web site, application or similar sites, may be applicable.

Any and all data, which does not fall under the category of personal data, as well as the anonymized data shall be excluded hereunder.

Issues relating to the processing of personal data of Company employees are not covered by this Policy and are regulated in the Aldridge Mineral Mining Limited Company's Employee Personal Data Processing and Protection Policy.

### 1.2 Execution and Amendment

This Policy has been published and made public by the Company on its website. In case of contradiction between the legislation in force, particularly the Law, and the regulations in this Policy the provisions of the legislation shall apply.



Company hereby reserves its right to amend the Policy in accordance with the legislative changes.

## **2. DATA OWNERS, DATA PROCESSING PURPOSES AND DATA CATEGORIES REGARDING PERSONAL DATA PROCESSING ACTIVITIES CARRIED OUT BY THE COMPANY**

### **2.1 Data Owners**

Data owners under the Policy are all real persons except for Company employees whose personal data is being processed by the Company. In this context, the categories of data owner in general are as follows:

	<b>DATA OWNERS CATEGORIES</b>	<b>EXPLANATION</b>
1	Visitor	It refers to real persons who visit the Company's headquarters, mining sites and the website.
2	Employee Candidate	It refers to real persons applying to the Company by applying for CV or other means.
3	Third Parties	The data contained above refers to the data owner categories and real persons except employees of the company.

Data owner categories are specified for purposes of sharing general information. The fact that the data owner does not fall within the scope of any of these categories does not eliminate the nature of the data owner as specified in the Law.

### **2.2 Purposes of Personal Data Processing**

Company may process your personal data and your sensitive personal data for purposes in accordance with the personal data processing requirements set out in the Law and related legislation.



Your personal data are collected by Company by means of cookies or the fields filled out by you in the capacity of data owners during use of the Web Site.

Company may use your personal data in order to assess, resolve and reply your requests/suggestions/complaints. Additionally; your personal data collected may be processed in order to enable Company to fulfill its statutory obligations, to determine usage habits of data owners, to perform marketing and sales activities, to manage human resources, to develop and improve the Web Site, as well as to eliminate any software-based errors.

### **2.3 Personal Data Categories**

The below-given personal data of you are collected and processed by Company hereunder:

- Name and surname,
- E-mail address,
- Request/suggestion/complaint you have sent to Company by means of the communication form,
- IP address,
- CV information you have communicated through Human Resources department.

## **3. PRINCIPLES AND CONDITIONS FOR PROCESSING PERSONAL DATA**

### **3.1 Principles for Processing of Personal Data**

We act in line with the below-given principles while processing your personal data:

- Regulations and principle of integrity are observed,
- Any such data are accurate, and up-to-date if and when so required,
- Any such data are processed for specific, explicit and legitimate purposes,
- Any such data are associated with, and limited to the purpose for which they are processed,
- Any such data are retained during the statutory period of time either prescribed under the respective regulations or with respect to the purpose for which they are processed.

### 3.2 Conditions for Processing of Personal Data

Your personal data is processed by the Company in the presence of at least one of the personal data processing conditions stated in Article 5 of the Law. Explanations regarding these conditions are given below:

- **Existence of explicit consent of the data owner**, in cases where other data processing conditions do not exist, the company may process the data owner's personal data in accordance with the general principles set out in the heading 3.1, if the data owner consents to the transaction with his free will, without hesitation, having sufficient knowledge of the personal data processing activity and only limited to that transaction.
- **If personal data processing is explicitly foreseen by law**, personal data may be processed by the Company without the express consent of the data owner. In this case, the Company will process personal data in accordance with the relevant regulations.
- **In the event that the explicit consent of the data owner cannot be obtained due to actual impossibility and that the processing of personal data is compulsory**, personal data of the data owner who is unable to disclose or whose consent cannot be given validity by the Company shall be processed if the processing of personal data is compulsory in order to protect the physical integrity of the data owner or life of a third party.
- **If personal data processing is directly related to the establishment or execution of a contract**, personal data processing will be performed if it is necessary to process personal data belonging to the parties established or already signed between the data owner and the Company.
- **In the event that it is compulsory to carry out personal data processing** activities in order to fulfill the legal obligation of the data controller, the Company processes the personal data in order to fulfill the legal obligations stipulated in the applicable legislation.
- **The company may process personal data, which has been disclosed to the public by the data owner** in any way, and which has been made public as a result of publicization, for the purpose of publicization, even without the express consent of the data owners.
- **If it is compulsory to process personal data for the legitimate interests of the data controller, under the conditions that it does not harm the principle right and freedoms of the data owner**, the Company will be able to process personal data by taking into consideration the balance with respect to the interests of the data owner. In this context, in the processing of data based on legitimate interest, the Company shall primarily determine the legitimate interest that will be obtained as a result of the



processing activity. The Company shall evaluate the possible impact of the processing of personal data on the rights and freedoms of the data owner, and perform the processing if Company considers the balance to be intact.

### **3.3 Conditions for Processing Sensitive Personal Data**

In Article 6 of the KVVK, sensitive personal data are specified in a limited manner. These are race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions and security measures, and the biometric and genetic data.

The Company may process sensitive personal data by providing additional measures determined by the Personal Data Protection Board in the following cases:

- **Processing of sensitive personal data other than health and sexual life** may be processed if the data owner expressly consent or if expressly provided for in the law.
- **Personal data relating to health and sexual life** may only be used by individuals or authorized institutions and organizations who are under the obligation of confidentiality to protect public health, to perform preventive medicine, medical diagnosis, treatment and care services, to plan and manage health services and financing without explicit consent of the data owner.

### **3.4 Sharing of Personal Data**

Company may share your personal data hereunder, as well as your new personal data to be obtained upon processing thereof, with the third parties, from which it procures support or service (including the cloud service providers), and the other Aldridge companies in order to achieve the data processing purposes as specified herein.

In addition to the foregoing; your personal data may be shared with any third party in order to develop and improve the Web Site, and to eliminate any software-based error. Finally; your personal data may be shared with the judicial and administrative authorities, or institutions and organizations which requests so in accordance with the statutory regulations. Your personal data may be retained on any server available in various countries.

## **4. DISCLOSURE OF DATA OWNERS AND RIGHTS OF DATA OWNERS**

You may exercise the below-given rights with respect to the processing of your personal data by directing a request to the Company:

- To inquire whether your personal data have been processed, or not;



- To request for information regarding any such processed personal data;
- To be informed about the purpose of processing of any such data, and also about the fact that whether such data have been used as appropriate to the purpose thereto;
- To be informed about the 3rd parties to which any such data has been transmitted either domestically or internationally;
- To request for correction of any imperfect or inaccurate data of you in case of any imperfect or inaccurate processing thereof;
- To request for deletion or disposal of any such personal data in accordance with the terms and conditions prescribed under the applicable regulations thereto;
- To request for information regarding correction, deletion and disposal processes, performed in accordance with the applicable regulations, to the third parties to which any such personal data has been transmitted;
- To raise an objection against such outcome in case of emergence of an outcome that is to the detriment of you upon the analysis of any such processed personal data solely by any automatic system; and
- To claim for compensation of any and all damage and/or loss you might have incurred in case any such personal data have been processed in breach of the law.

Any request to be submitted by you in order to exercise your rights regarding your personal data shall be concluded in maximum thirty (30) days by notify you. You hereby represent in the capacity of Data Owner that your personal data hereunder are in full, accurate and up-to-date, and you may update such data in case of any change thereto. Otherwise, Company may not be held liable with respect thereto. In the event that you raise any request which might prevent Company from using your personal data, you may not be entitled to utilize all or some of the functions of the Web Site.

## **5. CONTACT**

You can contact Company in order to send your inquiries on this Policy, and to exercise your rights regarding your personal data. Any contact, which has been established through any means other than the legal means, and which fails to comply with the form and content requirements as prescribed under the related applicable law, may be ignored by Company.