

Disclosure Statement for Employees for the Protection of Personal Data

Toros Tarım Sanayi ve Ticaret A.Ş., as the data controller, processes your personal data in accordance with the Law No. 6698 on the Protection of Personal Data (LPPD) and other relevant legislation.

According to Article 10 of the LPPD, which regulates the Disclosure Obligation, data controllers are obliged to inform the data subjects, whose personal data they process, on certain issues.

This disclosure statement has been prepared to fulfill the legal obligation and in accordance with the **Communique on the Rules and Procedures to Be Complied with in Fulfilling the Disclosure Obligation** published by the **Personal Data Protection Authority**.

Data Subject

You, whose personal data are processed by **Toros Tarım**, are considered an **Employee** due to the concluded employment contract and are accepted as a Data Subject by the Law.

Data Controller

Toros Tarım is the data controller who determines the purposes and means of processing personal data about you, and is responsible for the establishment and management of the data recording system.

Collection of Your Personal Data

The following shows your personal data and the methods of collecting it. The same personal data can be collected using more than one method.

<i>Method / Medium</i>	<i>Data</i>
<i>Directly from you via non-automated methods</i> <i>on paper</i>	Social Security, Identity, Address, Personnel, Organization Information, Contact, Payroll, Document Information, Health Information, Finance, Professional Experience, Education Information, Driver's License Information, Military Service Status, Resources Used, Discipline and Professional Chamber Information
<i>Directly from you via non-automated methods</i> <i>on card</i>	Identity
<i>From another data controller via non-automatic methods</i> <i>on paper</i>	Identity, Document Information and Legal Action;

Directly from you via non-automated methods <i>on paper</i>	Identity, Personnel, Organization Information and Document Information;
Directly from you via automated methods <i>electronically</i>	Health Information, Identity, Identity, Institution Information, Document Information, Travel and Card Pass System;
From another data controller via automatic methods <i>electronically</i>	Identity, Address, Organization Information, Finance, Identity and Finance;
Directly from you via automated methods <i>electronically</i>	Identity, Organization Information, Communication and Personality Inventory

Purposes and Legal Grounds of Processing Your Personal Data

The following table lists the legal grounds and purposes of processing your personal data.

<i>On the grounds that it is clearly stipulated in the laws in accordance with LPPD Article 5/2a</i>	
<i>To fulfill the obligations arising from the employment contract and legislation for the employees</i>	Identity, Address, Personnel and Contact
<i>To carry out occupational health/safety activities</i>	Identity, Address, Personnel and Organization Information
<i>To carry out storing and archiving activities</i>	Identity, Organization Information, Contact, Document Information, Transaction Security and Travel
<i>On the grounds of the necessity of processing the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract, as regulated in Article 5/2c of the LPPD.</i>	
<i>To carry out information security processes</i>	Identity, Organization Information and Transaction Security
<i>To carry out the application processes of job applicants</i>	Social Security, Identity, Address, Organization Information, Payroll and Education Information
<i>To carry out fringe benefits and benefits processes for employees</i>	Identity, Organization Information and Contact

<i>To carry out educational activities</i>	Identity, Organization Information and Professional Experience
<i>To execute activities in accordance with the legislation</i>	Identity, Organization Information and Document Information
<i>To execute finance and accounting works</i>	Identity, Organization Information, Document Information, Finance and Travel
<i>To carry out the assignment processes</i>	Identity
<i>To carry out internal audit/ investigation/intelligence activities</i>	Identity and Document Information
<i>To carry out communication activities</i>	Identity, Organization Information and Contact
<i>To execute/supervise business activities</i>	Identity, Organization Information, Contact, Document Information, Transaction Security and Professional Experience
<i>To carry out the procurement processes of goods/services</i>	Identity and Document Information
<i>To manage organizations and events</i>	Identity
<i>To carry out storing and archiving activities</i>	Identity, Personnel, Institution Information, Communication, Document Information, Transaction Security and Professional Experience
<i>To carry out the the work and residence permit procedures of foreign personnel</i>	Identity and Document Information
<i>To share information with authorized persons, institutions and organizations</i>	Identity, Address and Contact
<i>On the grounds that it is mandatory for the data controller in Article 5/2ç of the LPPD to fulfill his/her legal obligation</i>	
<i>To carry out emergency management processes</i>	Identity, Address, Organization Information and Contact
<i>To carry out the application processes of job applicants</i>	Identity and Military Service

<i>To fulfill the obligations arising from the employment contract and legislation for the employees</i>	Social Security, Identity, Personnel, Organization Information, Communication, Payroll, Document Information and Finance
<i>To carry out the activities in accordance with the legislation</i>	Identity, Address, Personnel, Organization Information, Contact, Document Information, Transaction Security, Professional Experience, Education Information and Professional Chamber Information
<i>To ensure physical security of space</i>	Identity, Organization Information, Transaction Security and Card Pass System
<i>To carry out occupational health/safety activities</i>	Social Security, Identity, Address, Personnel, Organization Information, Contact, Document Information, Professional Experience, Education Information, Traffic Accident Information, Driver's License Information and Vehicle
<i>To carry out storing and archiving activities</i>	Social Security, Identity, Address, Personnel, Organization Information, Contact, Payroll, Document Information, Transaction Security, Legal Transaction, Finance, Professional Experience, Education Information, Traffic Accident Information, Driver's License Information, Military Service, Vehicle, Insurance Policy Information and Card Pass System
<i>To share information with authorized persons, institutions and organizations</i>	Social Security, Identity, Address, Personnel, Organization Information, Contact, Payroll, Document Information and Legal Transactions
<i>On the grounds of the necessity of data processing for the establishment, exercise or protection of a right set in Article 5/2e of the LPPD</i>	
<i>To follow up on and execute legal affairs</i>	Identity, Address, Legal Transaction and Finance
<i>To fulfill the burden of proof of LPPD</i>	Identity and Document Information
<i>To carry out storing and archiving activities</i>	Identity, Address, Organization Information, Contact, Document Information, Legal Action, Finance, Traffic Accident Information, Driver's License Information, Vehicle, Insurance Policy Information and Discipline
<i>To carry out management activities</i>	Identity and Document Information
<i>On the grounds of the necessity of data processing for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject cited in Article 5/2f of LPPD</i>	
<i>To carry out information security processes</i>	Identity and Transaction Security

<i>To carry out the application processes of job carry applicants</i>	Social Security, Identity, Personnel, Organization Information, Payroll, Professional Experience and Education Information
<i>To execute access authorizations</i>	Identity, Organization Information and Transaction Security
<i>To carry out internal audit/ investigation/intelligence activities</i>	Identity, Document Information and Discipline
<i>To execute/supervise business activities</i>	Identity, Organization Information, Transaction Security, Finance and Card Pass System
<i>To carry out occupational health/ safety activities</i>	Identity, Institution Information, Document Information and Resources Used
<i>To carry out storing and archiving activities</i>	Identity, Address, Organization Information, Contact, Document Information, Transaction Security, Finance, Professional Experience, Education Information, Military Service, Resources Used, Card Pass System, Professional Chamber Information and Audio-Visual Recordings
<i>To fulfill the burden of proof of LPPD</i>	Identity and Document Information
<i>To ensure the security of movable goods and resources</i>	Identity, Organization Information, Document Information and Resources Used
<i>To carry out management activities</i>	Identity, Address and Organization Information
<i>In case of your explicit consent according to Article 5/1 of the LPPD</i>	
<i>To carry out talent/career development activities</i>	Identity, Organization Information and Contact
<i>Not seeking the explicit consent of the person concerned by the persons or authorized institutions and organizations that are under the obligation to keep secrets pursuant to the second sentence of Article 6/3</i>	
<i>To carry out occupational health/ safety activities</i>	Social Security and Health Information
<i>To carry out storing and archiving activities</i>	
<i>To share information with authorized persons, institutions and organizations</i>	Social Security
<i>In case you have given your explicit consent for the processing of your sensitive personal data, as regulated in Article 6/2;</i>	

To carry out the application processes of job applicants	Military Service
To carry out storing and archiving activities	Social Security and Military Service
To carry out talent/career development activities	Personality Inventory
To share information with authorized persons, institutions and organizations	Social Security
In case you have given your explicit consent regarding the transfer of personal data overseas, as regulated in Article 9/1;	
To carry out communication activities	Identity, Organization Information and Contact
To carry out storing and archiving activities	
To carry out the work and residence permit procedures of foreign personnel	Identity and Document Information

Transfer of Your Personal Data

Your personal data can be transferred to the relevant authorities without the obligation of disclosure and without your explicit consent, if requested within the scope of Article 28/1 of the LPPD.

Apart from this, in unforeseen circumstances, your personal data may be transferred to public institutions (administrative authorities such as ministries, Presidential boards, etc.) specified in the law, within the scope and limitations stipulated in the law, if requested in cases clearly stated in the law.

Your personal data is not transferred to any institution, person or organization other than our legal obligations that do not have the obligation to disclose and do not require your explicit consent.

Your personal data may be transferred;

Method / Medium	Data
to the Revenue Administration of the Republic of Turkey <i>for the declaration of monthly premium</i>	Payroll, Personnel, Identity and Social Security;
to the institutions operating in the field of Personal Pension Insurance <i>for personal pension system transactions</i>	Finance, Payroll, Communication, Organization Information, Personnel and Identity;

<p>to Pakçev Çevre Mühendisliği Danışmanlık Hizmetleri San. ve Tic. Ltd. Şti.</p> <p><i>in accordance with the declaration obligation</i></p>	Contact and Identity;
<p>to the Social Security Institution</p> <p><i>for the fulfillment of the declaration obligation</i></p>	Document Information, Communication, Organization Information, Personnel, Address, Identity and Social Security;
<p>to Enforcement Offices</p> <p><i>for complying with the obligation to respond</i></p>	Legal Transaction, Document Information and Identity;
<p>to the Social Security Institution</p> <p><i>for making entry/exit declarations</i></p>	Personnel, Address, Identity and Social Security;
<p>to the notary services</p> <p><i>for the follow up of legal affairs</i></p>	Finance, Legal Transaction, Address and Identity;
<p>to the Chamber of Commerce/Industry</p> <p><i>for the fulfillment of legal obligations</i></p>	Document Information and Identity;
<p>to Authorized Dealers</p> <p><i>for carrying out communication activities</i></p>	Organization Information and Identity;
<p>to Microsoft Corporation</p> <p><i>for carrying out communication activities</i></p>	Contact, Organization Information and Identity;
<p>to Microsoft Corporation</p> <p><i>for carrying out communication activities</i></p>	Contact, Organization Information and Identity;
<p>to the notary services</p> <p><i>for obtaining the list of authorized signatures</i></p>	Document Information and Identity;
<p>to the Ministry of Agriculture and Forestry of the Republic of Turkey</p> <p><i>for making an import application</i></p>	Document Information, Organization Information and Identity;
<p>to the Provincial Police Department</p> <p><i>for the declaration of identity</i></p>	Contact, Organization Information, Address and Identity;
<p>to the Chamber of Commerce/Industry</p> <p><i>or complying with the legislation</i></p>	Organization Information, Address and Identity;

to the Organization Firm <i>in order to organize events</i>	Identity;
to the Institutions operating in the field of Personnel Service <i>for the provision of services</i>	Contact, Organization Information and Identity;
to institutions operating in various fields <i>to carry out group activities</i>	Organization Information and Identity;
to institutions operating in the banking sector <i>for the payment of wages</i>	Finance, Payroll and Identity;
to the Consulates of the Republic of Turkey <i>for obtaining the necessary permits and visas for foreign employees</i>	Document Information and Identity;

Your Rights Regarding Your Personal Data

Data subjects must first apply to the data controller to exercise their rights regarding their personal data. According to Article 14 of the Law, no direct complaint can be made to the Personal Data Protection Authority.

Regarding your personal data, in accordance with the law, you can exercise your rights by contacting the data controller, that is us, in order to;

- a. Know whether personal data is processed or not,
- b. Request information if your personal data has been processed,
- c. Know the purpose of processing your personal data and whether they are used in accordance with its purpose,
- d. Know the name of the third parties in the country or abroad to whom your personal data is transferred,
- e. Request the correction of your personal data if it is incompletely or incorrectly processed,
- f. Request the deletion or destruction of your personal data in the event that the grounds for its processing no longer exist,
- g. Request notification regarding the transactions made pursuant to subparagraphs (e) and (f) to the third parties to whom your personal data has been transferred,
- h. Object to the emergence of a result against you due to analyzing your processed data exclusively through automated systems,
- i. Request the compensation of the damage in case you suffer damage due to the unlawful processing of personal data.

Applying to Data Controller

You may send your application in writing to the address: **Esentepe Mah. Büyükdere Cad. No: 209 Tekfen Tower Floors: 19 and 20, Şişli, İstanbul** or electronically to the registered address: **torostarim@hs02.kep.tr** using your registered e-mail address; or to **toros@toros.com.tr** using your e-mail address registered on our systems.

You can find more detailed information on the rules and procedures to be followed when making an application in the Communiqué on the Rules and Procedures of Application to the Data Controller of the Personal Data Protection Authority.

Toros Tarım Sanayi ve Ticaret A.Ş.

For detailed information, you can contact the Human Resources department.