

GALSAN



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Personal Data Processing and Protection Policy

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PURPOSE

1. Purpose

This policy aims to ensure the processing and storage of personal data in compliance with legal obligations and business processes, and to securely destroy it when the processing purpose is no longer valid or the retention period expires, while safeguarding the rights of the concerned parties under Articles 7, 10, and 11 of the KVKK.

2. **Scope:** It includes all personal data processed by all Galsan Group (Galsan Plastik ve Kalıp A.Ş. and its subsidiaries).

3. References:

Law No. 6698 on the Protection of Personal Data (KVKK)



4. GALSAN PLASTİK VE KALIP A.Ş. AND ITS AFFILIATES (GALSAN GROUP) PERSONAL DATA PROTECTION POLICY

4.1. Definition and Scope of Galsan Group

“Galsan Plastik ve Kalıp Sanayi A.Ş.” and “Pelitli Montaj ve Serigrafi Hizmetleri Ltd. Şti.” shall hereinafter be collectively referred to as the “Galsan Group.”

4.2. Information About the Data Controller:

As Galsan Group, we attach the utmost importance to the security of your personal data. With this awareness, as a Company, we place great importance on processing and safeguarding all kinds of personal data belonging to all individuals associated with the Company and our employees, including natural and legal persons who benefit from our products and services, in compliance with the Law No. 6698 on the Protection of Personal Data (“KVKK”).

With full awareness of this responsibility, in our capacity as the “Data Controller” as defined under the KVKK, we process your personal data in the manner set forth below and within the limits prescribed by the applicable legislation.

Galsan Group Data Controller: Doğan TATLISU / HR Manager

4.3. Processed Personal Data, Collection, Processing and Purposes of Processing:

Galsan Group may process the following personal data obtained from its customers, employees, prospective customers, job applicants, representatives and employees of official institutions, business partners, and suppliers. The processed personal data are listed below:

a) Identity Information: Name, surname, Turkish ID number, date of birth, place of birth, mother’s name, father’s name, passport information, identity card information

b) Contact Information: Phone number, e-mail address, residential address, emergency contact information

c) Location Data: Address information, workplace location information

d) Health Information: Blood type, medical reports, disability status, medical history, medication usage information, occupational accident records

e) Family Members and Relatives Information: Spouse and children information, degree of kinship, emergency contact person information

f) Occupation and Workplace Information: Job title, company/institution name, department information, employment history

g) Personnel Information: Employment start/termination dates, employment contract information, social security (SGK) information, salary information

h) Employee Performance and Career Development Information: Performance evaluation results, training and certification information, promotion and award information

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ii) Accident Report and Photographs: Location and date of the accident, report details, visual records

j) Customer Information: Customer name, surname, title, contact information (Natural Persons)

k) Risk Management Information: Insurance information, risk analysis reports, debt status (Natural Persons)

l) Job Applicant Information: Curriculum vitae (CV) information, interview results, reference information

m) Fringe Benefits and Benefits Information: Private health insurance information, company vehicle allocation information

n) Request/Complaint Management Information: Request and complaint details, resolution processes

o) Physical Premises Entry and Security Information: Building entry/exit records, visitor information, card access system data

p) Physical Premises Camera Records: CCTV footage

q) Special Categories of Personal Data: Health data

r) Transaction Security Information: Username and password information, IP address information, log records

s) Legal Transaction and Compliance Information: Case file information (criminal and enforcement proceedings), attorney correspondence, court decisions

t) Marketing Activity Information – Customer Information: Information of employees acting on behalf of customers (contact, e-mail, title)

u) Although it may vary depending on the products/services provided by Galsan Group and its operational and commercial activities, your personal data may be processed through automated or non-automated methods.

v) Your personal data shall be processed within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the Law, for the purposes of carrying out the necessary work by our relevant business units to perform the commercial activities conducted by the Company and executing the related business processes, planning and executing the Company's commercial and/or business strategies, and ensuring the legal, technical, and commercial/occupational safety of the Company and the relevant persons who have a business relationship with the Company.

4.GALSAN PLASTİK VE KALIP A.Ş. AND ITS AFFILIATES (GALSAN GROUP) PERSONAL DATA PROTECTION POLICY

4.4. To Whom and for What Purposes the Processed Personal Data May Be Transferred:

Your collected personal data may be transferred, within the scope of the personal data processing conditions and purposes specified in Articles 8 and 9 of the KVKK, to our business partners, suppliers, affiliated group companies, Company officials, shareholders, and legally authorized public institutions and private persons for the purposes of:

- carrying out the necessary work by our business units to enable you to benefit from the products and services offered by Galsan Group,
- ensuring that the products and services offered by our companies are aligned with your preferences and usage,
- ensuring the legal and commercial security of persons having a business relationship with Galsan Group Companies,
- determining, planning, and executing the commercial and business strategies of our Company, and
- ensuring the implementation of our Company's human resources policies.

Your personal data may be transferred to the following parties for the above-mentioned purposes and in compliance with Articles 8 and 9 of the KVKK:

- 1. Authorized Public Institutions and Organizations:** To institutions such as the Social Security Institution (SGK), Revenue Administration, Turkish Employment Agency (İŞKUR), and official security units, as required by legal obligations.
- 2. Our Service Providers:** To companies providing cargo, logistics, accounting, legal, and information technology support services.
- 3. Our Business Partners:** Suppliers and subcontractors.
- 4. Authorized Private Institutions:** Audit firms and occupational health and safety service providers.

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4.5. Method and Legal Basis for Collecting Personal Data:

Your personal data are obtained by the Company through all kinds of verbal, written, or electronic media for the purposes stated above, in order to ensure that the products and services we offer are provided within the prescribed legal framework and that our Company can fully and accurately fulfill its contractual and legal obligations.

Your personal data collected on this legal basis may be processed and transferred within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the KVKK.

Methods of Collecting Personal Data and Legal Grounds

Your personal data are collected through the following methods:

- a) Your Direct Declarations:** Employee contracts, application forms, customer agreements.
- b) Electronic Channels:** Website, mobile applications, e-mail correspondence.
- c) Physical Channels:** Camera systems, factory entry-exit records.

Your personal data are processed for the following purposes based on the legal grounds specified in Articles 5 and 6 of the KVKK:

- a) Performance of the Contract:** Receiving orders, managing production processes, carrying out delivery and payment processes.
- b) Fulfillment of Legal Obligations:** Compliance with legal obligations such as tax legislation, occupational health and safety regulations, and employee personal rights.
- c) Physical Premises Security:** Ensuring the security of our factories, warehouses, and office areas.
- d) Customer Relationship Management:** Managing complaint and request processes, increasing product and service satisfaction.
- e) Management of Business Processes:** Optimizing production and logistics processes and conducting efficiency analyses.
- f) Marketing Activities:** Informing about new products and services, provided that explicit consent is obtained.

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4.6. Storage Methods and Retention Periods of Processed Personal Data:

The primary retention periods for personal data are determined as set out below. In addition to documents for which retention periods are prescribed by law, implementation documents are also specified as follows. Documents and records subject to destruction are documented and recorded through formal minutes.

Data / Documents Containing Data	Retention Period	Relevant Legislation	Method of Destruction
Personnel Files of Employees	10 years from the date of termination	Labor Law, Turkish Code of Obligations	Shredded and sent for recycling
Personnel Information	10 years from the date of termination	Labor Law, Turkish Code of Obligations	Digitally destroyed
Health Reports and OHS Records	15 years from the date of termination	Occupational Health and Safety	Shredded and sent for recycling
Job Application Forms	Retained for 1 year	KVKK	Shredded and sent for recycling
Documents Used for Internal	Retained for 1 year after the last update	KVKK	Shredded and sent for recycling
Company E-mails of Employees	Active e-mails stored in the cloud;	KVKK	Digitally destroyed
Company Camera Records	30 days to 6 months	KVKK, Private Security Law	Digitally destroyed
Complaint Records from	Retained for 1 year; employee-related	Law No. 4857, Law No. 5510	Shredded and sent for recycling

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4.6. Storage Methods and Retention Periods of Processed Personal Data

1- Storage in Physical Environment

- a) Personal data are kept in locked and fire-resistant archive cabinets.
- b) Archive areas are accessible only to authorized personnel.
- c) Archives are regularly monitored, and unauthorized access is prevented.

2- Storage in Electronic Environment

- a) Data are stored on secure servers and encrypted databases.
- b) Access to sensitive data is protected through two-factor authentication.
- c) Backup processes are performed regularly, and backups are secured at a separate location.

3- Storage of Special Categories of Personal Data

- a) Special categories of personal data, such as health data and criminal record information, are protected with higher security standards compared to general data.
- b) Such data are stored in a separate system accessible only to specially authorized personnel.

4- Camera and Physical Security Data

- a) Camera recordings are retained for 30 days to 6 months and are automatically destroyed upon expiration of the retention period.
- b) Entry-exit logs are stored electronically for a period of 2 years.

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4.7. Destruction of Data:

Methods are determined in accordance with the conditions regarding the retention and destruction of records.

Destruction in Physical Environment

- a) Documents are destroyed using shredders or through a secure disposal method suitable for recycling.
- b) A destruction report is prepared and retained during the destruction process.

Destruction in Electronic Environment

- a) Data are securely removed from systems using software-based data erasure tools.
- b) Disks or devices are destroyed through physical shredding.

Anonymization

- a) Data are anonymized by removing all elements that may identify an individual and may be used for purposes such as statistical analysis.

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4.8. Technical and Administrative Measures for the Protection of Personal Data

Access Authorization and Security

Access Authorization: All employees may access only the data relevant to their duties. Access authorizations are regularly reviewed and updated.

Cybersecurity: Servers and databases are protected through firewalls, antivirus software, and regular system updates.

Logging and Monitoring: Access to data and all related transactions are continuously monitored and recorded.

The Company implements technical and administrative measures to ensure the security of personal data.

Technical Measures

- a) Systems containing data are protected by encryption and authentication mechanisms.
- b) Access authorizations are restricted, and log records are monitored.
- c) Up-to-date antivirus and firewall systems are used against malicious software.
- d) Data backup systems are implemented to protect against data loss.

Administrative Measures

- a) Employees are provided with training on KVKK compliance and data security.
- b) Access authorizations are determined based on position and are continuously reviewed.
- c) Data processing protocols and confidentiality agreements are executed with suppliers.
- d) Emergency response plans to be implemented in the event of a data breach are established.

4. GALSAN PLASTİK VE KALIP A.Ş. AND ITS AFFILIATES (GALSAN GROUP) PERSONAL DATA PROTECTION POLICY

4.9. Website Cookie Policy:

The cookie policy regarding the processing of personal data through digital platforms, particularly via the Company website, is explained in a separate document. (SEE: Privacy and Cookie Policy_Website)

4.10. Rights of the Personal Data Subject Arising from the KVKK:

If personal data subjects submit their requests regarding their rights to our Company through the methods set out below, our Company shall finalize the request free of charge within thirty (30) days at the latest, depending on the nature of the request.

However, if a fee is stipulated by the Personal Data Protection Board, the fee specified in the tariff determined by our Company shall be charged. Within this scope, personal data subjects have the right to:

- a) Learn whether their personal data are processed,
- b) Request information if their personal data have been processed,
- c) Learn the purpose of processing personal data and whether they are used in accordance with such purpose,
- d) Know the third parties to whom personal data are transferred domestically or abroad,
- e) Request the correction of personal data if they are incomplete or incorrectly processed,
- f) Request the deletion or destruction of personal data within the framework of the conditions set forth in Article 7 of the Law,
- g) Request notification of the transactions made pursuant to items (e) and (f) to third parties to whom the personal data have been transferred,
- h) Object to the occurrence of a result against the person by analyzing the processed data exclusively through automated systems,
- i) Request compensation for damages in case of suffering damage due to the unlawful processing of personal data.

Pursuant to paragraph 1 of Article 13 of the KVKK, requests regarding the exercise of the above-mentioned rights may be submitted in writing, with wet signature, to the Company address or via the Galsan Group communication channel at info@galsan.com.

Applications will be concluded as soon as possible and within thirty (30) days at the latest, free of charge depending on the nature of the request; however, if the process incurs an additional cost, the Company reserves the right to charge a fee in accordance with the tariff to be determined.

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4.11. Explicit Consent Request

Individuals who have been notified by us or have otherwise become aware that their Personal Data are being processed through various channels—primarily within the scope of employment or business relationships established with Galsan Group—should be aware that such data may be processed for the stated purposes in compliance with the Law No. 6698 on the Protection of Personal Data.

Galsan also requests consent from individuals in written or digital form through its standardized Explicit Consent Forms and Information Notices.

The following statement is used to obtain consent from individuals:

“You acknowledge and declare that Galsan Group has fulfilled its obligation to inform you within the scope of the Law No. 6698 on the Protection of Personal Data, that you have read and understood the information notice, that you are aware of your rights and obligations, and that, having been duly informed on the matter, you give your explicit consent to the processing of your personal data for the purposes specified under the Law.”

The assurance of service provision in cases where individuals do not consent to the processing of their Personal Data may vary depending on the purpose. For example, if a job applicant does not consent to the processing of their Personal Data, it will become impossible to conduct the interview process, establish the employment contract, and carry out personnel procedures. Therefore, explicit consent is of critical importance for the establishment of the employment relationship.



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Thank you for your interest and cooperation.

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