

**ACCORDING TO THE PERSONAL DATA PROTECTION LAW
CLARIFICATION TEXT ON PERSONAL DATA**

1. PURPOSE AND SCOPE

At **LASERSAN ADVANCED TECHNOLOGY SYSTEMS INC.**, we respect your privacy and are committed to ensuring the security of your personal data. With this awareness, we prioritize the processing, secure usage, and storage of all personal data of individuals benefiting from the products and services associated with LASERSAN, in compliance with the Personal Data Protection Law No. 6698 (KVKK).

LASERSAN ADVANCED TECHNOLOGY SYSTEMS INC., in its capacity as the "Data Controller," has prepared this text to inform and enlighten you about our practices regarding the collection, processing, transfer, secure storage, and destruction of personal data, in accordance with the Personal Data Protection Law No. 6698 (KVKK) and other relevant regulations.

2. DEFINITIONS

In this KVKK Information Text;

Personal Data: It refers to any information relating to an identified or identifiable natural person. The rationale defines a person as identifiable if the existing data can be linked in any way to a natural person, making them recognizable. (This includes information such as Name, Surname, National ID Number, Passport Number, Address, Phone Number, System Login-Logout Times, Visited Areas/Products and Transactions, Location-related data stored in databases or files, Digital data stored in applications such as job applications/resumes containing personal information held by HR or other departments, Order records, Date of Birth/Place of Birth, Vehicle License Plate, Email Address / IP Address, Fingerprints, Images and Audio Recordings, and any other similar data that can identify the person).

Special Data: Special categories of personal data are those that, if learned, could lead to discrimination or victimization of the individual. Therefore, they require much stricter protection compared to other personal data. Special categories of personal data can only be processed with the explicit consent of the individual or in limited circumstances as specified by law. (This includes data such as Race, Ethnic Origin, Political Opinions, Philosophical Beliefs, Religion, Sect or other beliefs, Appearance and Attire, Membership in Associations, Foundations or Unions, Health, Sexual Life, Criminal Convictions/Records, Security Measures, Biometric and Genetic Data).

Processing of Personal Data: Any operation performed on personal data, including the collection, recording, storage, modification, sharing with third parties, and transfer abroad, either automatically or through non-automatic means as part of a data recording system, is subject to the provisions of the **Personal Data Protection Law No.**

6698 ("KVKK"): The **Personal Data Protection Law No. 6698** was published in the Official Gazette on April 7, 2016, and came into effect.

Board: Personal Data Protection Board,

Explicit Consent: Consent given in relation to a specific subject, based on being informed and free will, provided in an unambiguous manner, and limited solely to that specific process.

Anonymization: It is the process of making personal data unable to be associated with an identified or identifiable natural person, even if matched with other data. **Kişisel Veri**

Owner (Contact Person): A natural person whose personal data is processed. For example, customers, suppliers, visitors, employees, and job candidates.

Data Processor: A natural or legal person who processes personal data on behalf of the data controller, based on the authority granted by the data controller.

Data Controller: The natural or legal person who determines the purposes and means of processing personal data, and is responsible for the establishment and management of the data recording system. This person determines the "**why**" and "**how**" of data processing activities in general.

Contact Person: The person responsible for maintaining communication with the organization and establishing contact with the Data Subjects. The contact person is not a representative of the Data Controller. The contact person does not have the authority to act on behalf of the Data Controller and is the person to whom requests from the organization are communicated. (In cases of questions and requests from Data Subjects, the contact person does not have decision-making authority and is only in a position to facilitate communication.)

3. RESPONSIBILITY

Data Controller: LASERSAN ADVANCED TECHNOLOGY SYSTEMS INC.

Contact Person: Tevfik AĞAR

Data Processors: All relevant parties processing data on behalf of LASERSAN

CONTACT

Title: LASERSAN ADVANCED TECHNOLOGY SYSTEMS INC.

Mercis no:

Email address: info@lasersan.tr

KEP Mail: lasersanadvanced@hs01.kep.tr

Postal address: Hilal Dist. 677. St. NO:7 Çankaya/Ankara

4. APPLICATION

LASERSAN ADVANCED TECHNOLOGY SYSTEMS INC. aspect ;

Our employees, our customers and their employees, our potential customers and their employees, our suppliers and their employees, our prospective employees, our visitors, our passengers, our business partners, the institutions we cooperate with and their employees and our other relevant 3rd Parties / Related Persons;

As the Data Controller, we are sensitive and take care to ensure that the personal data in our possession is collected, processed, transferred, securely stored and destroyed within the framework of the relevant legislation, especially the Constitution of the Republic of Turkey, the international agreements to which our country is a party, and the Personal Data Protection Law No. 6698.

4.1. PURPOSE AND LEGAL REASON FOR COLLECTING AND PROCESSING YOUR PERSONAL DATA

Your personal data is collected through our Company's units, processes, social media channels, real or legal persons, official institutions and organizations and employees with whom our Company cooperates or is authorized, through documents, records and transactions such as communication forms, employee complaint forms, performance tracking and analyses, social networks, various contracts, mobile applications, e-mails, correspondence, announcements, application forms, terminal passenger transactions, by automatic or non-automatic methods, verbally, in writing, electronically or by similar means without compromising our quality. It will be collected and processed for the purpose and scope defined below;

In accordance with Articles 4, 5 and 6 of KVKK 6698, your personal data;

- i. In accordance with the law and the rule of honesty,
- ii. In connection with the purposes of processing, in a limited and measured manner,
- iii. Accurate and up to date,
- iv. For certain clear and legitimate purposes
- v. They will be processed for the period stipulated in the relevant legislation or required within the conditions and purpose for which they are processed.

Moreover;

- ✓ Within the scope of the services you receive, to meet the expectations and requests of Customers, Suppliers, Employees, and all relevant third parties; to understand your desires and needs better by getting to know you; and to respond more quickly to your demands and requirements,
- ✓ Supporting your service and payment preferences,
- ✓ Planning and execution of corporate communication activities,
- ✓ Fulfillment of procurement requests, determination and approval of contract terms, planning and execution of finance and accounting activities,
- ✓ Planning and execution of legal activities,
- ✓ Planning, auditing, and execution of information security processes; establishment and management of information technology infrastructure,
- ✓ Planning and execution of activities within the scope of the sales and marketing processes of our services,
- ✓ Ensuring the necessary quality control of our services, and the creation of quality records and evidence,
- ✓ To conduct our quality and standard audits, or to fulfill legal and commercial obligations with individuals who have a business relationship with our company as required by regulations, and to carry out other obligations related to the determination and implementation of our company's legal, commercial, financial, and administrative operations and business strategies,
- ✓ Evaluation during the employee candidate application process and obtaining information from your references,
- ✓ Evaluation in case you apply for a job, within the scope of ensuring the implementation of our company's human resources policies,
- ✓ According to the Law on Regulation of Publications on the Internet (5651), usage information and durations in the incoming and outgoing logs related to internet services,
- ✓ The request for the company's business partners, as part of the strategic planning of senior management,
- ✓ To ensure the effective tracking of electronic records within the scope of human resources, they should be recorded through software, and this process should be maintained and archived with external server support provided domestically,
- ✓ Ensuring the implementation of our company's human resources policies and fulfilling our legal and regulatory obligations,
- ✓ In addition to the obligations set forth by the Labor Law, labor and social security legislation, and other applicable regulations, ensuring the implementation of our human resources policies, improving performance levels and employee satisfaction, and ensuring occupational safety and workplace harmony,
- ✓ Monitoring the reporting processes required by legislation, contract processes, and/or legal claims of our employees, ensuring that the relevant individuals

involved in the employment relationship fulfill their legal, technical, and commercial obligations, and ensuring occupational safety,

- ✓ Notifying the relatives of our employees in case of emergencies,
- ✓ Evaluating the ideas, opinions, and suggestions that we value as our employees,
- ✓ All data/information/statements declared in records related to 'Employee Satisfaction' conducted by Human Resources, in which employees voluntarily participate, for the execution of service processes,
- ✓ Salary payments,

4.2. TRANSFER OF YOUR PERSONAL DATA

Your personal data may be shared with Group companies for the purposes listed above, in accordance with the KVKK (Personal Data Protection Law) and applicable legislation, as well as, but not limited to, our shareholders, business partners, affiliates, suppliers, business contacts, service providers, and subcontractors, in line with the purpose of the services we provide, or with regulatory and supervisory authorities and official institutions in cases required by the relevant legislation.

4.3. STORAGE AND DELETION OF DATA

Our company stores the personal data it processes for the durations specified in the legislation, company procedures, and policies. In cases where no duration is specified in the legislation, personal data will be stored for the period necessary in accordance with the practices of our company and the customs of its commercial operations, based on the services provided while processing the data, and only for the duration necessary to serve as evidence in the event of potential legal disputes. (Commercial data is stored for 5 years, and personal data is stored for 10 years). After the specified periods have expired, the personal data is deleted, destroyed, or anonymized based on the need, in accordance with the "Secure Destruction Directive" and the methods defined in the relevant company procedures and policies.

4.4. YOUR RIGHTS AS A PERSONAL DATA OWNER

Within the framework of Article 11 of KVKK,

- I. To learn whether your personal data is being processed,
- II. To request information regarding your personal data if it has been processed,
- III. To learn the purpose of processing your personal data and whether it is being used in accordance with that purpose,
- IV. To know the third parties to whom your personal data has been transferred, either domestically or internationally,

- V. To request the correction of your personal data if it has been processed incompletely or incorrectly,
- VI. To request the deletion or destruction of your personal data in accordance with the conditions set forth in the KVKK legislation,
- VII. When you request the correction of incomplete or incorrect data, or the deletion or destruction of your personal data, to request that this be communicated to the third parties to whom your personal data has been transferred,
- VIII. To object to a decision that results in a negative outcome for you, made solely through the analysis of processed data by automated systems,
- IX. You have the right to request the compensation of any damage you suffer due to the unlawful processing of your personal data,

To exercise the rights mentioned above, please submit your written request along with the necessary information to identify your identity and explanations regarding the right you wish to exercise;

You can send the 'Application Form for Exercising Data Subject Rights' to **“LASERSAN ADVANCED TECHNOLOGY SYSTEMS INC. at Hilal Dist. 677. St. NO:7 Çankaya/Ankara”** either with a wet signature or via your personal registered electronic mail address to ‘lasersanadvanced@hs01.kep.tr’, or by using the electronic mail address previously notified to **LASERSAN** and registered in the data controller’s system, to info@lasersan.tr Applications must be made in Turkish or English.

- ✓ In the application where you will make your request to exercise your rights as a personal data subject, including the explanations regarding the right you wish to use as mentioned above;
- ✓ To ensure that the matter/issue you are requesting is clear and understandable,
- ✓ If the application is made in writing, the personal data subject's wet signature approval,
- ✓ To ensure that the matter you are requesting is related to you personally,
- ✓ If you are acting on behalf of someone else, you must be specifically authorized in this regard, and your authorization must be documented,
- ✓ The application must include identity and address information (residential or business address for notification purposes, email address for notification if available, phone number, or fax number).

The application must include documents that verify your identity (for Turkish citizens, the Turkish ID number; for foreigners, nationality, passport number/ID number, etc.).

Your applications submitted to us will be answered within thirty days from the date we receive your request, in accordance with Article 13, Paragraph 2 of the Personal Data Protection Law (KVKK Law), depending on the nature of the request. Our responses will be

delivered to you in writing or electronically, as required by Article 13 of the KVK Law. The data subject, in accordance with Article 14 of the Law No. 6698 on Personal Data Protection (KVKK), may file a complaint with the Authority within thirty days from the date they learn of our response, and in any case, within sixty days from the date of the application, with the person's consent, if the request is rejected, the response is deemed insufficient, or if no response is provided within the specified time.

Within the framework of Article 13 of the Law, if an additional cost arises, the Company reserves the right to charge you a fee according to the tariff determined by the Personal Data Protection Authority.

According to Article 28/2 of the Law No. 6698 on Personal Data Protection (KVKK); personal data subjects cannot assert their rights mentioned above, except for the right to request compensation for damages, in the following situations:

- ✓ The processing of personal data is necessary for the prevention of a crime or for a criminal investigation.
- ✓ The processing of personal data made public by the data subject himself/herself.
- ✓ The processing of personal data is necessary for the execution of supervision or regulatory duties by authorized public institutions and organizations or professional organizations with the quality of public institutions, based on the authority granted by law, or for the purpose of disciplinary investigation or prosecution.
- ✓ The processing of personal data is necessary for the protection of the State's economic and financial interests in relation to budget, tax, and financial matters.

4.5. CASES IN WHICH LASERSAN CAN PROCESS YOUR PERSONAL DATA WITHOUT YOUR EXPLICIT CONSENT IN ACCORDANCE WITH THE KVKK

ACCORDING TO ARTICLE 5 OF THE KVKK, LASERSAN MAY PROCESS YOUR PERSONAL DATA OBTAINED IN ACCORDANCE WITH THE LAW, WITHOUT REQUIRING YOUR EXPLICIT CONSENT, IN THE FOLLOWING CASES:

- In cases explicitly provided for by law,
- In cases where you are unable to express your consent due to physical impossibility or in situations where your consent is not legally valid, the processing of your personal data is necessary for the protection of your own or someone else's life or physical integrity,
- LASERSAN and its affiliated companies, insofar as it is directly related to the establishment or execution of a contract made with third parties specified in Article III, may process personal data of the parties to the contract as necessary,
- It is necessary for LASERSAN to fulfill a legal obligation,

- Your personal data has been made public by you,
- Processing of data is necessary for the establishment, use, or protection of a right,
- Provided that it does not harm your fundamental rights and freedoms, processing of data is necessary for LASERSAN's legitimate interests.

4.6. RIGHTS OF THE DATA SUBJECT UNDER THE EUROPEAN UNION GENERAL DATA PROTECTION REGULATION (GDPR)

- ✓ The right to transparent information regarding the exercise of the data subject's rights, when personal data concerning the data subject is collected from the data subject; the right to be informed of the identity and contact details of the controller and, where appropriate, the controller's representative, and, where applicable, the contact details of the data protection officer, as well as the legal basis for the processing activities and the purposes for which the personal data is intended to be processed,
- ✓ The right to be informed of the information specified in Article 14 of the GDPR, in case the personal data is not collected from the data subject,
- ✓ The right of the data subject to confirm with the controller whether their personal data is being processed, and if processing is taking place, to request access to the personal data and the following information,
- ✓ The right of the data subject to request the controller to rectify inaccurate personal data concerning them without undue delay,
- ✓ Taking into account the purposes of processing, the right of the data subject to complete incomplete personal data, including by means of an additional statement,
- ✓ The right of the data subject to request the erasure of personal data concerning them without undue delay from the controller,
- ✓ The right of the data subject to request the restriction of processing activities from the controller,
- ✓ The data subject has the right to receive personal data concerning himself or herself, which he has provided to a controller, in a structured, commonly used and machine-readable format,
- ✓ The right to transmit this data to another controller without any hindrance from the controller to whom the personal data is provided,
- ✓ The data subject has the right to object at any time to processing of personal data concerning him or her,

- ✓ The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or has a similarly significant impact on him or her.

The relevant legal regulations in force will be applied as a priority in the processes within the scope of the Information Text regarding the Collection, Processing, Transfer, Safe Storage and Destruction of this Personal Data.

In case of incompatibility between the legislation in force and the Information Text, the Data Controller accepts that the applicable legislation will apply.

KVKK Information Text came into force on 26.03.2025. If the entire Information Text or certain articles are renewed, the publication date will be updated and re-announced.

The Information Text is made available to our third parties on our website <https://www.lasersan.tr>.