

**This Privacy Notice applies to the company**

**RHI MAGNESITA TURKEY REFRAKTER TİCARET ANONİM ŞİRKETİ in the Republic of Turkey**

**Version: April 2020**

## **RHI MAGNESITA TURKEY REFRAKTER TİCARET ANONİM ŞİRKETİ PRIVACY NOTICE**

RHI MAGNESITA TURKEY REFRAKTER TİCARET ANONİM ŞİRKETİ takes the adequate security measures to ensure that personal data is collected, stored and shared in accordance with the applicable law.

Our aim is to inform the data subjects in the transparent manner regarding the collection of their personal data, the purposes of processing, shared parties, legal reasons and their rights, pursuant to Article 10 of the Turkish Law on Protection of Personal Data No. 6698.

### **a) Data Controller**

Personal data are collected and processed by RHI MAGNESITA TURKEY REFRAKTER TİCARET ANONİM ŞİRKETİ (“COMPANY”), as the data controller, in accordance with the Turkish Law on Protection of Personal Data No. 6698 ("Law No. 6698"), within the scope described below.

### **b) Purpose of Personal Data Processing**

The COMPANY may collect personal data in the categories such as identity information, contact information, customer information, customer transaction information, health information, performance information, transaction security information, legal action and compliance information and marketing and sales information from the parties such as customers, employees, potential customers, candidate employees, business partners and suppliers.

The collected personal data are processed;

- To present the products and services of the COMPANY and to fulfill our obligations, to organize records and documents, to comply with the local and international legislation,
- To offer special advertisements, campaigns, advantages and benefits for sales and marketing activities,
- To increase the quality of services and products,
- To communicate in order to transfer the necessary information regarding the information processing requirements, system structure, the necessity of the information support services received,
- To carry out statistical analysis, segmentation/profiling and CRM studies for sales and marketing activities,
- To measure and increase customer satisfaction, to manage customer complaint, suggestion and opinions about new services and products, to receive your problem-error notifications, to inform you about products, services, your complaints and your inquiries,



- To contact data subjects, to receive orders, to perform payment transactions, to provide logistic cooperation with 3<sup>rd</sup> parties and sending the products, to identify the services and products that may be of interest and recommending in this direction, to send promotion and gifts, to conduct online behavioral advertising and marketing, to measure and develop the quality of the provided services, to manage our customer portfolio by profiling and scoring,
- To provide comparative product and/or service offers, to model and improve existing or new product studies and/or developments, to provide every product and services presented within the scope of the law and related legislation that regulates COMPANY's main contract,
- To comply with the information retention, reporting and notification obligations stipulated by competent authorities, to fulfill the regulatory and legal obligations of the COMPANY regarding the legal and contractual requirements,
- To manage financial operations, communication, market research, social responsibility activities, purchasing operations (demand, proposal, evaluation, ordering, budgeting, contract), internal system and application management operations, prevent and investigate potentially unethical or unlawful behavior, legal and internal audits operations carried out by the COMPANY or the group companies where it is part of, in line with the aim of determining and implementing the commercial and business strategies and defend the legitimate interests,
- to comply with, and implement the RHI Magnesita group policies, guidelines and procedures,
- to inspect, analyze and respond to the inquiries coming from both affected persons and authorities.

**c) Persons to whom the processed personal data can be transferred and for which purpose**

The personal data collected solely for achievement of the objectives stated above may be transferred, within the framework of the personal data processing conditions and purposes stated in articles 8 and 9 of the Law No. 6698 to:

- The business partners, shareholders, subsidiaries of the COMPANY,
- Persons or entities permitted by the Turkish Tax Procedure Law, Social Security Institution legislation, Law on Prevention of Laundering of Proceeds of Crime, Law on Prevention of Money Laundering, Turkish Commercial Code, Code of Obligations and other legislative provisions,
- Legally authorized public institutions and organizations, administrative authorities and judicial authorities,
- Foreign companies and subsidiaries that are part of RHI Magnesita Group and mainly in the EU/EEA countries,
- Real or legal persons from whom we purchase service in product / service comparison, analysis, evaluation, advertising and achievement of the above-mentioned objectives, program partner institutions and organizations, organizations contracted by us for sending the messages we send to our customers, cargo companies delivering you the placed orders.

**ç) Method and Legal Reason for Collecting Personal Data**

Personal Data are collected, both fully or partially and by means of automated or non-automated methods that are part of the data filing system;

Directly by the data subjects or by persons or companies authorized to act on their behalf via applications made through contracted websites, stores and corporate personnel of COMPANY, the institutions that have support service relations with the COMPANY, natural and/or legal persons and directly automated systems (website, mobile application, call center, social media accounts) on verbal, written and/or electronic media;

The legal reasons are specified in articles 5 and 6 of the Law no. 6698 which are:

- Being clearly stated by applicable law,
- Being mandatory for the COMPANY's fulfillment of its legal obligations,
- Being directly related to the establishment and/or performance of the contract,
- Being obligatory for the legitimate interest of the COMPANY, provided collection is not harmful to the fundamental rights and freedoms,
- Being publicized by the data subjects,
- Being obligatory for the establishment, use and protection of a right,
- And presence of clear consent.

#### **d) Rights of Personal Data Subject listed in article 11 of the Law No. 6698**

If data subjects submit requests for their rights through the methods outlined below, the COMPANY will finalize the request as soon as possible and within thirty days at the latest according to nature of the request. No charge will be applied up to ten (electronic or other format) pages in the reply to be given. For each page above ten pages, processing fee will be charged with 1 Turkish Lira. If the response to the application is given in a recording medium such as a CD or flash memory, the fee that may be requested by the COMPANY will not exceed the cost of the recording medium.

In this context, data subjects are entitled to:

- Know whether personal data is processed,
- Request for information regarding their personal data if it has been processed,
- Know the purpose of personal data processing and whether it is used for intended purpose,
- Know the third parties to whom the personal data is transferred at home or abroad,
- Request for correction of the personal data in case it is processed incompletely or inaccurately and request for communication of the transaction performed in this scope to the third parties to whom the personal data is transferred,
- Request for deletion or destruction of personal data if the reasons for processing have eliminated although it has been processed in accordance with the Law No. 6698 and other applicable law provisions and request for communication of the transaction performed in this scope to the third parties to whom the personal data is transferred,
- Object any consequence arising to the detriment of the person by analyzing the processed data exclusively through automatic means,

- Request for compensation of any damages arising from the unlawful processing of the personal data.

In accordance with paragraph 1 of article 13 of the Law No. 6698 and the Communiqué Regarding the Procedures and Principles for Application to the Data Controller No. 30356, dated 10.03.2018, data subjects may submit request to exercise the rights mentioned above, in Turkish language and in writing or by registered electronic mail (KEP) address, secure electronic signature, mobile signature or the electronic mail address previously notified to the COMPANY and registered in our system. Only information about the applicant will be given to the applications and it will not be possible to obtain information about other family members and third parties. The COMPANY reserves the right to verify the data subjects' identity before responding.

The data subject's application must include:

- a) name, surname and, if the application is written, the signature,
- b) Turkish ID number for citizens of the Republic of Turkey, or for foreigners, the nationality, passport number or identity number, if any,
- c) Address of residence or place of business for the purposes of notices,
- ç) electronic mail address, telephone and fax number, if any, for the purposes of notices,
- d) Subject of request, and information and documents related to the subject, if any, should be attached to the application.

The applications in writing and attached documents may be send to the address of the COMPANY at: Vişnezade Mah. Şehit Mehmet Sok. Maçka Residences No: 9 C Kule Ticari Kat: 3 Beşiktaş, İstanbul.

The data subject can access the application form [from here](#).

Data subjects may also make the applications by e-mail to the address: [ESK Magnesit KVKK@rhimagnesita.com](mailto:ESK_Magnesit_KVKK@rhimagnesita.com) or may submit also via the KEP to our KEP address: [magnesit@hs01.kep.tr](mailto:magnesit@hs01.kep.tr)

According to the nature of the request, the information and documents required for identification must be submitted to us in complete and accurate form. In cases where the requested information and documents are not provided properly, it may cause problems for a complete and qualified conduct of investigations to be performed by the COMPANY for the request. In this case, the COMPANY declares that it reserves its statutory rights to not handle the request. For this reason, the request for application should be dispatched completely and in a manner that shall include the requested information and documents based on the nature of the request.