

CORPORATE GENERAL DISCLOSURE STATEMENT ON THE PROCESSING OF PERSONAL DATA

Your personal data may be processed by ESKA VALVE A.Ş. (“ESKA” or the “Company”) as the data controller in compliance with the provisions of Law No. 6698 on the Protection of Personal Data (“Law”), within the scope detailed below.

1) Categories of Personal Data Processed and Purposes of Processing

Your personal data will be processed by ESKA VALVE A.Ş. in accordance with Article 4.2 of the Law, ensuring that it adheres to the principles of:

- (i) Compliance with the law and good faith,
- (ii) Accuracy and, where necessary, up-to-date status,
- (iii) Processing for specific, explicit, and legitimate purposes,
- (iv) Relevance, limitation, and proportionality to the intended processing purpose,
- (v) Retention for the duration stipulated by applicable legislation or required for the purpose of processing.

In alignment with the aforementioned principles and within the context of our ongoing business relationships with our partners (where an individual may belong to more than one category), personal data may be processed for the purposes outlined below.

2) Purposes of the Personal Data Processed

Your personal data will be processed in accordance with the data processing conditions and purposes set forth in Article 5 of the Law for the following purposes:

- a) Compliance with legal and regulatory obligations,
- b) Conducting financial and accounting processes,
- c) Managing and supervising business operations,
- d) Providing after-sales support services for goods/services,
- e) Managing the sale of goods/services,
- f) Executing membership registration and account management in the event of your membership,
- g) Administering customer relations,
- h) Implementing campaigns, promotions, and notifications,
- i) Ensuring the necessary business functions for the execution of the Company’s commercial activities and managing the relevant business processes,
- j) Conducting marketing analysis studies,
- k) Managing contractual procedures,
- l) Providing information to authorized individuals, institutions, and organizations,
- m) Ensuring physical security within company premises,
- n) Resolving legal disputes,
- o) Managing data storage and archiving activities.

3) Recipients of Your Personal Data

Upon the fulfilment of the purposes for processing your personal data, the processed data may be disclosed to authorised public institutions and organisations to ensure compliance with legal regulations, to facilitate legal proceedings, and to provide necessary information to authorised entities within the scope defined by the applicable laws. Furthermore, it may be shared with suppliers, third-party legal entities, IT service providers, logistics companies, insurance providers, financial institutions, and our financial consultant to the extent necessary for the execution and supervision of business activities, risk management processes, and the proper delivery of our services. Additionally, your data may be transferred to legally authorised public institutions and private entities, including the Personal Data Protection Authority, to establish, exercise, or protect legal rights and to fulfil our legal obligations, in accordance with the data processing conditions set forth in Article 5 of the Law and the rules governing data transfers outlined in Article 8 of the Law.

Your profile, including details such as name, surname, telephone number, email address, direct marketing records, and preferences, may be shared with the local cloud service provider Bulutistan Telekomünikasyon A.Ş., and TRtek Teknolojik Ürünler Bilgisayar Yazılım Donanım Sanayi ve Ticaret Ltd. Şti., from which we receive technical services, for the purposes of conducting marketing activities, enhancing customer satisfaction, and improving service performance. Additionally, data may be shared with local natural gas distribution companies with which we collaborate. In the course of these operations, your data may also be transferred to Meta, Inc. and Google Platforms.

4) Legal Basis for the Collection of Your Personal Data

Your personal data may be collected by ESKA in accordance with the objectives specified above and in compliance with Article 5 of the LPPD, based on the following legal grounds:

- (a) When explicitly provided for by law;
- (b) When necessary for the execution or performance of a contract, provided that it is directly related to the contracting parties;
- (c) When required for the data controller to fulfil its legal obligations;
- (d) When processing is necessary for the establishment, exercise, or protection of a legal right;
- (e) When data processing is necessary for the legitimate interests of the data controller, provided that it does not infringe upon the fundamental rights and freedoms of the data subject.

Furthermore, the identity and contact details of our Customers and Potential Customers may be processed based on explicit consent to facilitate marketing activities, including the dissemination of advertisements, campaigns, promotions, and commercial electronic messages through the preferred communication channel.

If you choose to become a member, your personal data will be processed based on the necessity of data processing for the legitimate interests of the data controller, ensuring that such processing does not adversely affect your fundamental rights and freedoms. This will be done to manage membership registration, operate your membership account, enhance customer satisfaction, facilitate customer relations, support the execution of our Company's commercial activities, and manage communication channels effectively.

5) Methods of Collecting Your Personal Data

Your personal data, categorized as mentioned above, are obtained through automated or non-automated means, including but not limited to contracts, visitor forms, websites, call centers, mobile applications, social media, telephone, internal systems, information systems, electronic devices, and other documents provided by the relevant individual.

6) Exercising Your Rights Regarding Your Personal Data

Pursuant to Article 11 of the Law, you are entitled to the following rights:

- a. To inquire whether your personal data has been processed,
- b. To request information if your personal data has been processed,
- c. To learn the purpose of processing your personal data and whether it is used in accordance with its intended purpose,
- d. To be informed about third parties, either domestic or international, to whom your personal data has been transferred,
- e. To request rectification in case of incomplete or inaccurate processing of personal data and to request that third parties to whom the data has been transferred be notified of such correction,
- f. To request the deletion or destruction of personal data if the reasons necessitating its processing no longer exist, even if it has been processed in compliance with the Law and other relevant regulations, and to request that third parties to whom the data has been transferred be notified accordingly,
- g. To object to decisions arising from the exclusive analysis of processed data through automated systems that may have an adverse effect on you,
- h. To claim compensation in case of damage resulting from the unlawful processing of personal data.

You may submit your requests concerning your rights under Article 11 of the PDPL, which governs the rights of data subjects, by using the 'Application Form to the Data Controller' available on the ESKA VALVE website.

Data Controller: ESKA VALVE A.Ş.

Address: SAKARYA I.ORGANİZE SANAYİ BÖLGESİ MAH. 11. CAD. NO: 6 ARİFİYE / SAKARYA

Mail: kvkk@eskavalve.com