## CLARIFICATION TEXT ON THE PROCESSING OF PERSONAL DATA IN COMMERCIAL TRANSACTIONS

As SANLAB Simülasyon Araştırma Geliştirme Sanayi Ticaret A.Ş., we attach great importance to the security and confidentiality of your personal data. In this regard, we take all necessary measures and exercise the highest level of care to protect personal data. We would like to inform our valued stakeholders, from whom we receive or to whom we provide goods and services, about the processing of their personal data. In addition, we recommend that you review our Internet Disclosure Text regarding the processing of your personal data in the online environment.

#### 1. DATA RESPONSIBLE

Our company processes your personal data in the capacity of 'Data Controller' as defined in Article 3 of the Law No. 6698 on the Protection of Personal Data.

## SANLAB SİMÜLASYON ARAŞTIRMA GELİŞTİRME SANAYİ TİCARET A.Ş.

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#### 2. PURPOSES AND LEGAL REASONS FOR PROCESSING PERSONAL DATA

Your personal data in the categories of *identity, communication, transaction security, physical space security, legal transaction, customer transaction and finance* that we collect from you within the scope of offer, contract, current account transactions, payment, collection, notification, business and strategy development activities;

- Your data in the categories of *identity, communication, transaction security and customer transaction* based on the reason that it is clearly stipulated in the laws (Art. 5/2-a of Law No. 6698),
  - Execution of Activities in Compliance with the Legislation
  - Execution of Finance and Accounting Affairs
  - Monitoring and Execution of Legal Affairs
  - Execution / Supervision of Business Activities
  - Execution of Goods / Service Procurement Processes
  - Execution of Storage and Archive Activities
  - Providing Information to Authorized Persons, Institutions and Organizations
  - Execution of Management Activities

### Objectives,

- Your data in the categories of identity, communication, customer transaction, transaction security and finance based on the reason that it is necessary to process personal data belonging to the parties to the contract (Art. 5/2-c of Law No. 6698), provided that it is directly related to the establishment or performance of a contract.
  - o Execution of activities in accordance with the legislation
  - Conducting finance and accounting affairs
  - Monitoring and Execution of Legal Affairs
  - Conducting communication activities
  - Execution/supervision of business activities
  - Execution of Logistics Activities
  - Execution of Goods / Service Procurement Processes
  - o Execution of Supply Chain Management Processes
  - Execution of Contract Processes
  - Carrying out storage and archive activities
  - o Informing authorized persons, institutions and organizations

#### Objectives,

- Based on the reason that it is mandatory for the data controller to fulfill its legal obligation (Art. 5/2-ç of Law No. 6698); your data in the categories of *identity*, communication, customer transaction, physical space security and finance,
  - o Execution of Activities in Compliance with the Legislation
  - Execution of Finance and Accounting Affairs
  - Ensuring Physical Space Security
  - Monitoring and Execution of Legal Affairs
  - Execution / Supervision of Business Activities
  - Execution of Goods / Service Procurement Processes
  - Execution of Risk Management Processes
  - Execution of Storage and Archive Activities

- Providing Information to Authorized Persons, Institutions and Organizations
- Execution of Management Activities

## Objectives,

- Your data in the categories of *identity, communication, customer transaction and finance*, based on the establishment, exercise or protection of a right (Law No. 6698 5/2-e),
  - Conducting finance and accounting affairs
  - o Execution/supervision of business activities
  - o Monitoring and Execution of Legal Affairs
  - Execution of Contract Processes
  - Carrying out storage and archive activities
  - o Informing authorized persons, institutions and organizations

### Objectives,

- Your data in the categories of identity, communication, customer transaction, physical space security and transaction security based on the reason that data processing is mandatory for the legitimate interests of the data controller (Art. 5/2-f of Law No. 6698), provided that it does not harm the fundamental rights and freedoms of the data subject,
  - Conducting finance and accounting affairs
  - Ensuring Physical Space Security
  - Conducting communication activities
  - Execution of Goods / Service Procurement Processes
  - Execution of Risk Management Processes
  - Carrying out storage and archive activities

## Objectives,

processed by us.

#### 3. METHOD OF COLLECTING PERSONAL DATA

Your personal data are legally obtained through our website in the electronic environment, forms and various interview tools/applications in the physical environment, closed circuit imaging systems in the physical environment by automatic,

partially automatic or non-automatic methods provided that they are part of any data recording system. Your personal data that we collect from you personally and authorized institutions are processed based on the legal reasons listed above in the Law No. 6698 on the Protection of Personal Data.

# 4. TO WHOM AND FOR WHAT PURPOSES THE PROCESSED PERSONAL DATA IS TRANSFERRED

We transfer your personal data that we process within the scope of our commercial activities and the purchase of goods and services to Natural Persons and Private Legal Entities, our Group Companies and Authorized Public Institutions and Organizations for the following purposes.

- Your personal data in the categories of identity, communication, legal transaction, customer transaction, transaction security and finance to Natural Persons and Private Legal Entities, Group Companies;
- Execution of Activities in Compliance with the Legislation
- Execution of Finance and Accounting Affairs
- Monitoring and Execution of Legal Affairs
- Execution of Communication Activities
- Execution / Supervision of Business Activities
- Execution of Logistics Activities
- Execution of Goods / Service Procurement Processes
- Execution of Contract Processes
- Execution of Supply Chain Management Processes
- Providing Information to Authorized Persons, Institutions and Organizations

## Objectives,

- Your personal data in the categories of identity, communication, transaction security, customer transaction and finance to Authorized Public Institutions and Organizations;
  - Execution of Activities in Compliance with the Legislation
  - Execution of Finance and Accounting Affairs
  - Monitoring and Execution of Legal Affairs
  - Execution of Communication Activities

- Execution / Supervision of Business Activities
- Execution of Storage and Archive Activities
- Providing Information to Authorized Persons, Institutions and Organizations

Objectives,

and within the framework of the above-mentioned personal data processing conditions.

#### 5. RIGHTS OF THE PERSON CONCERNED

You can send your requests regarding your rights under Article 11 of the Law No. 6698 regulating the "rights of the data subject" and the application of the law to our e-mail address kvkk@sanlab.net in writing or by using the registered electronic mail (KEP) address or the e-mail address you have previously notified to our website and registered in our system or in accordance with other application procedures stipulated in the Communiqué on the Procedures and Principles of Application to the Data Controller. We will finalize your request free of charge as soon as possible and within 30 (thirty) days at the latest - up to ten pages - depending on its nature.