

CLOSE TO OUR CUSTOMERS

WIRTGEN ANKARA MAKINASANAYI AND TICARET LIMITED SIRKETI**PRIVACY STATEMENT ON PROTECTION AND PROCESSING
OF CUSTOMERS' PERSONAL DATA****Revision Date: 18.03.2019****1. Objective**

Wirtgen Ankara Makine Sanayi ve Ticaret Limited Sirketi (referred to as "**Wirtgen**" or "**the Company**" hereinafter) aims at processing and protecting the personal data of its natural person customers in compliance with the Personal Data Protection Law No: 6698 (referred to as "**PDP Law**" hereinafter) and various legislation provisions.

We would like to inform you that your personal information which you have given or will give to our Company as a natural person customer of our Company and/or any of your personal information which are obtained by our Company by any other channel will be subject to the following activities and treated under the following principles by our "Data Protection Officer":

- Your personal data will be saved, stored, rearranged and may be shared with public entities who are authorized to demand these personal data by law,
- Your personal data may be classified, transferred, disclosed to third people in Turkey or at abroad under conditions set out in the PDP Law, or processed, classified in various ways stipulated in the PDP Law and subject to various other treatments listed in the PDP Law.
- Your personal data will be used for and in relation to certain purposes, in a limited and duly manner.
- Correctness and your personal data being updated will be protected and maintained in the way they were notified by you or transferred to us.

This Privacy Statement aims at performing and developing the activities by Wirtgen in compliance with the principles enshrined in the PDP Law.

2. Collection Procedure of the Personal Data of Natural Person/Customers

Our Company will process your personal data for the purposes stated in this Privacy Statement. In case of a change in these purposes, your consent will be obtained separately.

The primary personal data collected and used by our Company are as follows:

	<i>Content of the Personal Data:</i>
Identity Data	Documents such as driving license, identity card showing information such as name, surname, Turkish ID no, taxpayer identification no, nationality, names of mother and father, date and place of birth and gender, etc.

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Employee Personal Data	Information on duties and powers of the concerned person.
Contact Data	Telephone number, fax number, open address information, country, city, e-mail address (including extension number and institutional e-mail address).
Financial Data	Personal data processed on information, document and records showing the all kinds of financial result created depending on the legal relationship established between the Company and the concerned person and bank account information, IBAN no, credit card number, etc. (such as data concerning collection and payment transactions, etc.)
Customer Process Data	The records concerning the use of the products and services, instructions for the use of products and services by the customer, demands of customers, customer number, contract numbers, date of transaction and bank account number, etc.
Other Data	Data such as the ones present on sales report, data concerning amount, region, materials, date of order, order number, package type, delivery information, etc.
Special Personal Data	Blood type and religious information, etc.
Physical Space Security Data	Personal data concerning the records and documents kept at the entry to the physical space and during stay in the physical space, camera records, fingerprint records and the records taken at the security point, etc.

Your personal data is collected by means of the documents which you provided to our Company before or after the constitution of the contractual relationship and throughout this contractual relationship, or all kinds of documents obtained from third parties or public entities and agencies due to the reasons stipulated in the laws, or through physical or electronic channels for the purposes stated in the Law; and the cameras we placed at the Company premises.

3. Objectives and Legal Causes for Processing Personal Data

Your personal data can be processed in pursuit of the objectives which include, but not limited to the following:

complying with/fulfill the requirements/ obligations listed in the legislation, including, but not limited to the Revenue Tax Law No: 193, Corporate Tax Law No: 5520, Stamp Tax Law No: 488, Value Added Tax Law No: 3065; to perform the contract and proposal submission processes, to implement the corporate policies, in particular:

- Conducting banking procedures,
- Conducting invoice procedures,

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- Conducting processes of work contract,
- Conducting import procedures,
- Performing exchange rate valuation,
- Conducting e-invoice procedures,
- Performing the procedure concerning reconciliation/settlement form,
- Conducting customer information notification processes,
- Conducting customer communication, proposal and invoice procedures,
- Processing customer data under the scope of the software program,
- Performing tasks concerning sales estimation processes,
- Performing specifications processes.

Your personal data will be retained for a reasonable period of time specified in the respective legislation or until disappearance of the purpose of processing and elapse of the legal statute of limitation.

4. Transfer of Personal Data to Third People

Your Personal Data may be transferred to the authorized public authorities and agencies, suppliers, business partners, associates and group companies of our Company, in order to meet the legal obligations and contractual requirements in line with the legislation, including, but not limited to the Personal Data Protection Law No: 6698, Turkish Code of Commerce, Code of Obligations, the Revenue Tax Law No: 193, Corporate Tax Law No: 5520, Stamp Tax Law No: 488, Value Added Tax Law No: 3065.

4.1. Transfer of Personal Data to the Third People at Home

Your Personal Data are transferred to the authorized public authorities and agencies, suppliers, business partners and group companies of our Company, in order to meet the legal obligations and contractual requirements in line with the legislation, including, but not limited to the Personal Data Protection Law No: 6698, Turkish Code of Commerce, Code of Obligations, the Revenue Tax Law No: 193, Corporate Tax Law No: 5520, Stamp Tax Law No: 488, Value Added Tax Law No: 3065, particularly with a view to:

- to ensure continuity of the business,
- to inform the authorized public authorities and agencies,
- to conduct accounting procedures,
- to conduct customer processes,
- to inform customers.

4.2. Transfer of Personal Data to Third People At Abroad

Personal information are shared with the associates and group companies, suppliers and business partners of our Company, particularly in order to make and perform Contracts and also

- to make comparisons,
- to conduct comparison,
- to follow up the concerned processes of the Group Company.

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5. Ensuring the Privacy and Security of Personal Data

Our Company takes all kinds of technical and administrative measures to prevent processing of personal data it processes illegally and illegal access to the personal data, to ensure the security level needed to protect personal data, in compliance with the Article 12 of the PDP Law.

5.1. Technical Measures to Prevent Illegal Processing and Illegal Access to Personal Data

- to take all kinds of technical, technological security measures and keep your personal data under protection against possible risks,
- to establish the software programs and infrastructure needed to ensure security,
- to limit access to data processed by the Company,
- to use a backup program in line with legal requirements in order to keep the personal data in a secure conditions,
- to use the software programs including anti-virus protection.

5.2. Administrative Measures to Ensure Legal Processing and Illegal Access to Personal Data

- to train and raise awareness in the personnel of the Company in respect to the provisions of the PDP Law,
- to ensure that the third person to whom personal data is transferred also comply with the data security requirements as they are bound with respective provisions in their respective conditions, in cases of personal data transfer,
- to detect the requirements to be filled in order to comply with the provisions set out in the PDP Law and prepare corporate policies for the concerned practices.

5.3. Measures to be Taken When Personal Data Disclosed Illegally

In cases where the processed personal data are obtained by others through illegal ways, our Company will notify this to the concerned data owner and the Board.

6. Deletion, Destruction and Anonymization of Personal Data

In cases where the reasons requiring the processing of data no longer exist although they were processed in accordance with the respective legislation, the personal data are deleted, destructed or anonymized by our Company on ex officio basis or upon the request submitted by the data subject, under the scope of the Article 7 of the PDP Law.

The terms and procedures to be applied will be established in accordance with the PDP Law and the secondary legislation which will be enacted in connection with this Law.

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6.1. Techniques Used for Deletion and Destruction of Personal Data

For example: Physical destruction, deletion of data from software in a secure way, deletion of data by an expert in a secure way...

6.2. Techniques Used for Anonymization of Personal Data

This means turning the personal data into a state where it is not possible to relate them to any natural person who can be matched or identified with any other data.

7. Rights of the Customer

As a Customer, you are entitled to apply our Company to demand the following in respect your personal data, in accordance with the Article 11 of PDP Law:

- a.** to learn whether your personal data has been processed or not,
- b.** to demand information on this processing activity, if your data was processed,
- c.** to learn about the purposes of personal data processing and whether your data was used in pursuit of such purposes,
- d.** to learn about the third people at home and at abroad to whom your personal data were transferred,
- e.** to ask our Company to correct your personal data which are incomplete or incorrect and notify the concerned third people to whom this transaction was transferred and processed the data in incomplete/incorrect form,
- f.** to ask our Company to delete, destruct or anonymize your personal data if the reasons requiring processing them no longer exist, and to notify the concerned third people to whom they were transferred to on the transaction performed under this scope,
- g.** to object to a result which occurs against the data subject by analyzing the processed personal data through analyzes automatic systems,
- h.** To claim the indemnification of damage incurred on you as a result of illegal processing of your personal data.

Our Company will conclude your application demands submitted on a "Data Subject Application Form" within 30 (thirty) days at the latest, on free of charge basis, in line with the Article 13 of the PDP Law. In the event that application is rejected, you will be notified in writing in person or electronically on the cause(s) of the rejection, depending on the nature of the demands.

This Privacy Statement may be subject to revision by our Company when deemed necessary. In cases of revision, you will be notified on the revision. Please find the updated version of the Statement at

<https://www.wirtgen-group.com/ankara/tr/bilgi/privacy-policy/>.