

STM SAVUNMA TEKNOLOJİLERİ MÜHENDİSLİK VE TİCARET A.Ş.
DECLARATION OF CLARIFICATION ON THE PROCESSING OF PERSONAL DATA
FOR TRANSMITTING COMMERCIAL ELECTRONIC MESSAGE

We, as STM Savunma Teknolojileri Mühendislik ve Ticaret A.Ş. (“**STM**” or “**Company**”), would like to provide you with information and clarification pursuant to Article 10 of Law No. 6698 on the Protection of Personal Data (“**LPPD**”) on the following subjects regarding our processing operations of personal data and commercial electronic message activities that we carry out within the scope of the Law No. 6563 on the Regulation of Electronic Commerce (“**The Law No. 6563**”).

- a) which personal data we are collecting,
- b) for what purposes the data shall be processed,
- d) to whom and for what purpose the personal data can be transferred,
- e) the legal reason of collecting personal data and,
- f) about the rights you have within the scope of LPPD

1. Who we are?

Pursuant to the LPPD, we are STM Savunma Teknolojileri Mühendislik ve Ticaret A.Ş. the Data Controller, who can process, record, store, classify, update personal data of you who are competitors in accordance with the law and honesty rules and disclose/transfer to third parties where permitted by the legislation and/or limited to the purpose for which they are processed, which determines the purposes and means of processing your personal data and is responsible for the establishment and management of the data recording system within the scope of the purposes explained below.

2. Which data we process?

Identification Data (Name-Surname), Contact Data (E-mail Address, Phone Number),

3. Which Methods Do We Use On the Processing of Your Personal Data?

Your aforementioned personal data shall be processed in accordance with the basic principles stipulated in the LPPD; with regard to our business activity for sending commercial electronic message, your personal data is safely stored in a physical or electronic setting for an appropriate amount of time for the purpose of being processed.

You can access more detailed information on the subject of the purposes for processing your personal data by our Company by visiting www.stm.com.tr and reading the STM Personal Data Protection and Privacy Policy.

4. For What Purposes Do We Process Your Personal Data?

We may process your personal data limited to the objectives laid out above, in particular to ["https://thinktech.stm.com.tr/tr"](https://thinktech.stm.com.tr/tr), automatically or non-automatically, in written, verbal, electronic and other ways, by STM through different departments and different channels.

In this framework, your personal data can be processed and transferred without obtaining your explicit consent by means of obtaining explicit consent in light of the principles envisaged in article 4(2) and 5(2) "processing of personal data belonging to the parties of a contract, is necessary provided that it is directly related to the conclusion or fulfilment of that contract" and "Data processing is mandatory for the establishment, exercise or protection of a right" of the LPPD.

5. Transferring Your Personal Data

Your personal data, processed in the scope of the expressed objectives; limited to the objectives laid out above, within the conditions and purposes for processing personal data specified in articles 8 and 9 of the LPPD, in accordance with the basic principles envisaged in the LPPD, within the personal data processing conditions specified in Articles 5 and 6 of the LPPD , limited to the objectives laid out above; according to Law No. 6563. and Regulation on Commercial Communication and Commercial Electronic Messages ("Regulation") pursuant to scope of perform our legal obligations to The Centralized Commercial Message Management System ("CCMMS"), will be transferred to the CCMS Business Partner from whom the service is obtained for the purpose of carrying out commercial electronic message processes.

6. Your Rights as a Relevant Person Pursuant to Article 11 of the LPPD

The rights you have pursuant to Article 11 of the LPPD are as follows:

- a) to learn whether his personal data are processed or not,
- b) to request information if his personal data are processed,
- c) to learn the purpose of his data processing and whether this data is used for intended purposes,
- d) to know the third parties to whom his personal data is transferred at home or abroad,
- e) to request the rectification of the incomplete or inaccurate data, if any,
- f) to request the erasure or destruction of his personal data under the conditions laid down in Article 7¹,
- g) to request notification of the operations carried out in compliance with subparagraphs (d) and (e) to third parties to whom his personal data has been transferred,
- h) to object to the processing, exclusively by automatic means, of his personal data, which leads to an unfavourable consequence for the data subject,

¹ ARTICLE 7- (1) Despite being processed under the provisions of this Law and other related laws, personal data shall be erased, destructed or anonymized by the controller, ex officio or upon demand by the data subject, upon disappearance of reasons which require the process. (2) Provisions of other laws concerning the erasure, destruction or anonymizing of personal data are reserved. (3) Procedures and principles for the erasure, destruction or anonymizing of personal data shall be laid down through a by-law.

- i) to request compensation for the damage arising from the unlawful processing of his personal data

Personal data owners, as the “Data Subject”, you should submit your requests regarding your rights in “written” pursuant to paragraph 1 of Article 13 of the KVKK or by filling out and signing the Data Subject Application Form at www.stm.com.tr or by making other requests determined by the Personal Data Protection Board.

You can forward your requests in order to exercise your above-mentioned rights **including the necessary information to identify you** to "Mustafa Kemal Mahallesi, 2151. Street No: 3/ A Çankaya 06530 Ankara Turkey" in "Turkish" according to the 2nd clause of the 4th article of the Communiqué on the Procedures and Principles of Application to the Data Controller or e-mail either to privacy@stm.com.tr or stmsavunma@hs01.kep.tr and your explanations regarding your right that you request to exercise from the rights specified in Article 11 of the LPPD. Depending on the nature of the request, STM will conclude the request free of charge as soon as possible and within thirty (30) days at the latest. However, if the transaction requires an additional cost, the fee in the tariff determined by the Board shall be charged by us.

7. Duration of Storage of Personal Data

The personal data you have shared with STM, will processed as long as the aforementioned, legitimate purposes remain in any case such that it abides by the periods of time mandated in all relevant legislation, primarily the LPPD, your approval records will be kept for 3 (three) years from the date of registration, and other records related to commercial electronic messages will be kept for 3 (three) years from the date of registration.

I declare that I have read and understood this Declaration Of Clarification by marking out the relevant section in the E-Bulletin Subscription.