

## CLARIFICATION TEXT

### 1. Introduction

This clarification text has been prepared by SST Teknoloji Anonim Şirketi ("**SST**") in the context of recruitment, suitability assessment, and evaluation of the competencies of employees and intern candidates for the planning of human resources needs necessary for recruitment, suitability checks, placement, personnel or intern procurement within the scope of activities. Your personal data obtained during the consideration, evaluation of job applications and the execution of these processes will be processed by SST in accordance with the Constitution of the Republic of Türkiye, international agreements to which our country is a party regarding human rights, Law No. 6698 on Protection of Personal Data ("**KVKK**"), the Communiqué on Principles and Procedures to be Followed in Fulfillment of the Obligation to Inform, and the General Data Protection Regulation ("**GDPR**"), and other relevant legislation and decisions of the Personal Data Protection Board, in order to ensure compliance and effective exercise of your rights.

As the data controller, SST will process personal data limited to the scope described below, preserving the accuracy and currency of personal data received by us, in accordance with the current legislation including KVKK and GDPR, and related to the purposes listed below and connected with these purposes, in a limited and proportionate manner.

### 2. Definitions

The personal data, sensitive personal data, and data processing concepts used in this clarification text are used in accordance with the definitions provided in the KVKK. The term "personal data" as used in the KVKK refers to any kind of information relating to an identified or identifiable natural person; the term "sensitive personal data" refers to data related to individuals' race, ethnicity, political opinion, philosophical belief, religion, sect, or other beliefs, appearance, association, foundation or union membership, health, sexual life, criminal conviction, and data related to security measures as well as biometric and genetic data; and the term "processing of personal data" refers to any operation performed on data such as obtaining, recording, storing, preserving, altering, rearranging, disclosing, transferring, taking over, making available, classifying, or preventing the use of data, either entirely or partially, by automatic means or non-automatic means provided that it is a part of any data recording system.

### 3. Categories of Personal Data

The personal data processed within this clarification text, along with the categories of such data and the sources from which they were obtained, are detailed in the table below.

<b>Category of Personal Data</b>	<b>Identity Information</b>
	Name, surname, date of birth, marital status, signature
<b>Source of Personal Data Obtained</b>	1.The personal data is collected through job application forms or directly/indirectly through transmitted emails/resumes.

	<ol style="list-style-type: none"> <li>2. It is obtained from employment platforms such as Kariyer.net.</li> <li>3. It is provided by the individual themselves.</li> </ol>
<b>Personal Data Category</b>	<b>Contact Information</b> Telephone number, residential address, email address
<b>Source of Personal Data</b>	<ol style="list-style-type: none"> <li>1. Collected via job application forms or transmitted directly/indirectly via email/resume.</li> <li>2. Obtained from employment platforms such as Kariyer.net.</li> <li>3. Provided by the employee.</li> </ol>

<b>Personal Data Category</b>	<b>Legal Process</b> Existing lawsuit information
<b>Source of Personal Data</b>	The current case information is obtained by the SST on the grounds of whether it is a reinstatement lawsuit, and it is collected through the job application form or the resume personally submitted by the job applicant or candidate.

<b>Personal Data Category</b>	<b>Health Information, Criminal Convictions, and Security Measures Information</b> Health information, *(due to the absence of a disabling illness/disability for employment), criminal convictions or applicable security measures information that may pose a barrier to the applied position.
<b>Source of Personal Data</b>	The information is provided by the individual themselves through the job application form or the resume personally submitted by the job applicant or candidate, and it is obtained by the SST.

<b>Personal Data Category</b>	<b>Professional Experience</b> Diploma information, attended courses, in-service training details, certifications Education status, training and skills, resume (CV)
<b>Source of Personal Data</b>	<ol style="list-style-type: none"> <li>1. Job application forms or through emails/resumes submitted directly or indirectly.</li> <li>2. Obtained from employment platforms such as Kariyer.net, etc.</li> </ol>

<b>Personal Data Category</b>	<b>Visual and Auditory Data</b> Photographs, closed-circuit security camera footage
<b>Source of Personal Data</b>	<ol style="list-style-type: none"> <li>1. Photographs are provided by the employee under the employment documents and obtained by the SST. Also obtained from employment platforms such as Kariyer.net, etc.</li> </ol>

	2. Audio recordings and security camera footage are obtained from the relevant devices.
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<b>Personal Data Category</b>	<b>Physical Space Security</b> Entry and exit records, camera recordings
<b>Source of Personal Data</b>	Obtained from closed-circuit security cameras.
<b>Personal Data Category</b>	<b>Job Candidate Information</b> Education status, schools attended and graduation year, training and skills, seminars and courses, computer knowledge, foreign language proficiency, reference information, club memberships and interests, work experience, employment status and title, job description, company/organization names, periods of employment
<b>Source of Personal Data</b>	<ol style="list-style-type: none"> <li>1. Collected through job application forms or directly/indirectly via email/resume submissions.</li> <li>2. Obtained from employment platforms such as Kariyer.net, LinkedIn, etc.</li> </ol>

#### 4. Purposes of Processing Personal Data

Your personal data will be processed in accordance with the purposes of,

- Planning human resources processes, ensuring the management of the process in applications made by job candidates and internship candidates to our company, providing necessary notifications for the recruitment processes, evaluating the candidate for the position applied for in the recruitment process, managing the process, and organizing meetings and interviews with the candidate, enabling the human resources department to perform necessary activities related to the recruitment process, ensuring the security of technical, legal, commercial, and business processes with relevant individuals in our company and those in business relations with our company, planning and executing corporate communication activities.
- Ensuring audit and security.
- Conducting human resources activities and planning processes, conducting activities in compliance with legislation, informing authorized institutions and organizations, keeping records of employees' entrances and exits, ensuring audit and security.
- Providing job organization related to the employee, determining the duties and authorities of the employee in internal activities, effective management of personnel, keeping the employee's personal file and arranging related transactions, determining the rights and obligations of the employee concretely, determining and

managing secondary benefits such as premiums, incentives, transportation, vehicle facilities, meals within the company, fulfilling contractual and statutory obligations for employees, executing salary policy, conducting training activities, controlling the working status of employees, conducting human resources activities and planning processes, conducting activities in compliance with legislation.

- Conducting suitability assessment of the employee's position, conducting activities in compliance with legislation.
- Carrying out the recruitment process of job candidates by the SST and processing the application forms, and contacting you in case there is an open position at the SST.
- Contacting the individuals specified as references during the job application process, sharing personal data with the SST, and contacting them for reference checks.

These purposes, in compliance with the personal data processing conditions specified in Articles 5 and 6 of the Personal Data Protection Law, will be processed.

## **5. Special Categories of Personal Data**

Your health data, biometric data (such as fingerprints), and location, GPS data are considered special categories of personal data under the personal data protection legislation. These data may be processed for the purpose of enforcing workplace rules, carrying out administrative and personnel affairs, ensuring workplace security, fulfilling legal obligations, complying with occupational health and safety legislation, and in the event of a position opening among the group companies of SST, for the purpose of conducting the transfer process in line with your request and/or demand.

Your health data is protected with the highest security measures and is not shared with any third party outside of SST, its group companies, life and private health insurance companies, and firms undertaking intermediary tasks with these companies. Typically, only the company physician and health personnel have access to health data.

## **6. Transfer of Your Personal Data**

Your personal data;

- To authorized public institutions and organizations and legally authorized private individuals for the purpose of fulfilling legal obligations,
- To relevant judicial authorities for the conduct or follow-up of judicial processes,
- To the supplier company providing services to SST regarding tests, exams, interviews conducted for the purpose of assessing suitability for the job,
- With your explicit consent, if available, to these individuals or companies for the evaluation of our business partners and affiliates,
- Due to the infrastructure servers of the electronic systems used by SST being located abroad, automatic transfer of services such as Office 365 abroad, and also

due to SST being a multinational group company and employment processes being carried out based on approval from overseas centers, personal data and special categories of personal data shared with free will may be transferred abroad in accordance with the procedures and principles stipulated in the relevant legislation and in accordance with the conditions and purposes of personal data transfer specified in Articles 8 and 9 of the KVKK.

Additionally, your collected personal data may be transferred to our shareholders, domestic business partners, group companies, legally authorized public and private institutions and organizations, and also, with your explicit consent, to our business partners and group companies abroad, within the scope of the purposes specified in Article 4 of this clarification text, for the evaluation of your job application request and suitability for the relevant position, the execution and conclusion of the recruitment processes in accordance with SST's human resources policies, and for communication with you, in accordance with the provisions in relevant legislation and the fundamental principles stipulated in the Personal Data Protection Law (KVKK) and the General Data Protection Regulation (GDPR), and within the conditions specified in Articles 8 and 9 of the KVKK, provided that the infrastructure servers of the electronic systems are located abroad.

## **7. Method of Collection and Legal Basis for Processing Your Personal Data**

Your personal data is collected both electronically and physically through email, websites, employment platforms, social media, phone and call center channels, printed forms, and hand-delivery or postal channels.

The legal basis for processing your personal data by SST is the explicit consent provided by you in accordance with Article 5/1 of the Personal Data Protection Law (KVKK) and the second paragraph of Article 6, and exceptions to explicit consent specified in subparagraphs (e) and (f) of Article 5/2 of the KVKK. Your personal data is collected for the purposes specified in Article 4 of this clarification text in compliance with all relevant legislation, including the KVKK.

Furthermore, your personal data will be collected if explicitly provided for in the laws specified in Articles 5 and 6 of the KVKK, for the establishment and/or performance of a contract, establishment, use, and/or protection of a right, fulfillment of a legal obligation, and for the purpose of publicizing if already made public, as well as based on legitimate interests and your explicit consent if provided.

Your personal data will be deleted, destroyed, or anonymized when the purpose requiring the processing of your personal data according to Article 7/1 of the KVKK ceases to exist and/or when the statutory limitation/storage periods for processing your data have expired.

## **8. Storage Period**

Your data will be stored for the periods required to achieve the purposes of collection and as regulated in the relevant legislation.

Additionally, personal data shared with SST with your explicit consent may be retained by SST for a period of 1 (one) year in order to re-establish contact with the job/internship candidate in case of an open position and to be re-evaluated for the relevant position, in line with the purposes mentioned above.

## **9. Data Subject Rights**

The data subject has the following rights regarding their personal data:

- To learn whether their personal data is being processed or not,
- To request information if their personal data has been processed,
- To learn the purpose of the processing of personal data and whether they are being used in accordance with the purpose,
- To request information about third parties to whom personal data is transferred, whether domestically or abroad,
- To request correction if personal data is incomplete or inaccurate,
- To request deletion, anonymization, or destruction of personal data if the reasons requiring the processing of personal data cease to exist,
- To request notification to third parties to whom personal data has been transferred regarding the correction, deletion, anonymization, or destruction process mentioned above,
- To object to the occurrence of a result against them by solely analyzing the processed personal data through automated systems,
- To request compensation for damages in case of suffering damage due to unlawful processing of personal data.

It is acknowledged that you have been informed about your rights granted by the current legislation, including but not limited to the KVKK and the General Data Protection Regulation (GDPR), along with this clarification text, and that you are aware of these rights.

## **10. Data Subject Rights Procedure**

Data subjects can exercise their rights specified in Article 9 of this clarification text by filling out the "KVKK Request Form" document and sending it in written and wet-signed form to the address Küçükbakkalköy Mahallesi Kayışdağı Caddesi Allianz Plaza No: 1 İç Kapı No: 106 34750 Ataşehir/İstanbul or to the email address info@ssttek.com, or by using their registered electronic mail (KEP) address if signed with a secure electronic signature or mobile signature, provided that the methods specified by the Personal Data Protection Board are preserved.

The data subject should clearly specify the requested matter in the application, including explanations regarding the right they wish to exercise.

The subject matter of the application must relate to the individual making the application, and if acting on behalf of someone else, the applicant must be specifically authorized in

this regard and this authorization must be documented (special power of attorney). Additionally, the application must contain the identity and address information, and identity verification documents must be attached to the application.

Requests made by unauthorized third parties acting on behalf of others will not be considered.

## **11. Data Security**

At SST, we prioritize the confidentiality and security of all personal data processed within our organization. In line with this, SST takes all necessary technical and administrative security measures to protect personal data against unauthorized access, damage, loss, or disclosure risks.

## **TEXT OF EXPRESS CONSENT**

This Open Consent Statement has been prepared to document whether you consent to the processing of your personal data and sensitive personal data within the scope detailed in the Information Text prepared in accordance with the Personal Data Protection Law numbered 6698.

In addition, we would like to remind you that by accepting this Open Consent Statement, you acknowledge and consent to the processing and transfer of your personal data based on the legal basis of "explicit consent" regulated in the Personal Data Protection Law numbered 6698, unless you request the deletion, anonymization, or destruction of the relevant data. Therefore, it is important to review the Information Text in detail.

With this Open Consent Statement, you consent to the processing of your personal data and sensitive personal data collected through the methods specified in the Information Text and their transfer domestically and internationally within the scope of the purposes specified in this statement.