



## Data Security, Protection and Privacy

### Our Commitment

imza MARINE S.A. is committed to protecting the privacy rights of our employees and everyone with whom we do business. We will only use personal data for appropriate purposes, and personal data will be processed in accordance with applicable data protection regulation.

### Our Safeguards

imza MARINE S.A. processes personal data about employees and external consultants working from imza MARINE S.A premises or in imza MARINE S.A systems. imza MARINE S.A also processes personal data about data subjects who are not employed or engaged by imza MARINE S.A, to whom this privacy policy is primarily aimed.

imza MARINE S.A will always process personal data fairly and lawfully, and only for a specified, explicit and legitimate purpose or as required by law. imza MARINE S.A will therefore only process personal data when such processing is necessary for us to manage our operations, provide services or other legitimate business interests, comply with legal or contractual obligations or after receiving consent (the latter which can be withdrawn at any time). Withdrawing consent will not affect the lawfulness of the processing based on the consent prior to withdrawing it. Further information on specific legal basis is provided below.

imza MARINE S.A will ensure appropriate information security related to confidentiality, integrity and availability. Personal data will be retained only for the period that is required to serve the legitimate purpose.

Third party service providers may process personal data on behalf of imza MARINE S.A within various areas. imza MARINE S.A has implemented adequate safeguards in accordance with applicable law to protect your personal data processed by third party service providers.



imza MARINE S.A processes personal data about data subjects that are not employed or engaged by imza MARINE S.A for these various purposes:

### **Procurement and other business relation purposes**

imza MARINE S.A processes personal data necessary to procure goods and services from suppliers and contractors, for contract management and for human rights verifications. The data processed for such purposes include contact information and human resources information. The legal basis is imza MARINE S.A's legitimate interest in ensuring good management of and support of our suppliers, partners and customers.

### **Local grievance mechanisms**

imza MARINE S.A has established local grievance mechanisms in order to receive, investigate and respond to grievances from individuals, communities, or their representatives about imza MARINE S.A or its contractors' activities adverse impact on communities or individuals. The personal data processed includes contact information and other data necessary for performing the grievance-processes. The legal basis is performance of a task carried out in the public interest or legitimate interest.

### **Screening**

To ensure regulatory compliance with Turkish and international regulations on sanctions, as well as ensuring compliance with anti-money-laundering regulation, imza MARINE S.A may perform a screening of external third parties with whom imza MARINE S.A has relations. More information about sanctions can be found here. The personal data processed is contact information, position and results from the screening activity. The legal basis is legitimate interest, legal obligation or performing the obligations and exercising the rights of imza MARINE S.A in the field of employment, social security and social protection law.

### **Communication**

imza MARINE S.A communicates externally and internally with the general public, specific target groups and individual persons. Examples of communication activities performed by imza MARINE S.A or third parties are distribution of newsletters, press releases, company reports, optimising websites, organising events, handling user-initiated dialogue, providing information to public authorities, conducting surveys, and communicating in social media networks. The personal data processed includes contact information and communication-related information. The legal basis is legitimate interest in providing information and ensuring good management of and support for our customers, suppliers and partners, or your consent.

### **Recruitment and onboarding**

imza MARINE S.A processes personal data for recruitment purposes to ensure that imza MARINE S.A recruits qualified candidates. The personal data processed include contact

information, recruitment and human resources information. The legal basis Imza MARINE S.A rely on for processing your personal data relates to processing necessary to perform a contract or to take steps at your request, before entering a contract, or your consent to being included in the CV-database.

Imza MARINE S.A also processes personal data to cater for onboarding of external personnel into the Imza MARINE S.A organization based on mergers and/or acquisitions and/or transfer of an undertaking. The personal data processed include contact information, recruitment and human resources information. The legal basis Imza MARINE S.A relies on in these circumstances is legal obligation or legitimate interest.

### **Recordings of certain trading activities**

For certain trading activities, Imza MARINE S.A. processes contact information and the full content of commercial conversations on telephone and IM to document negotiations, trading and agreements as well as to ensure compliance to regulatory requirements for documentation.

### **Categories and collection of personal data**

For easier understanding of this privacy policy we have set up the following categories. This does not mean or entail that the processing will always entail all the examples of personal information included in the categories.

The categories of personal data Imza MARINE S.A may collect and hold about data subjects include:

- Contact information, such as names and addresses, telephone numbers and email addresses, titles etc.
- Recruitment information, such as application, CV, references, background checks, interviews and assessments, immigration and relocation information, exit surveys
- Human resources information such as details about an individual's work experience and qualifications, date of birth, identification documentation, driver's license details; national identity, social security number, employee number, position, organization, bank account, next of kin, union membership, location, salary and leader
- Communication-related information, such as public political relations, positions, preferences related to marketing and events (including allergies/diets restrictions when provided by participants), and information related to user behavior in own communication-channels (including IP-addresses).

Personal data may be collected in several ways, including:

- directly by Imza MARINE S.A staff when establishing a business relationship or through operational dealings;

- from a third-party service provider or agent, from a source of publicly available information (e.g. websites) or from an employer (e.g. where a supplier or contractor provides personal data about their employees);
- through use of Imza MARINE S.A website; or
- data provided directly by you.

### **Transfer of personal data**

imza MARINE S.A. will ensure that the European rules on trans-border data flows are complied with when personal data are transferred to external processors (outside of the imza MARINE S.A.) located outside of EU/EEA or located in a country that is not recognised by the EU Commission as ensuring an adequate level of protection. Examples of such safeguards are, Local GDPR rules, EU Standard Contractual Clauses or other applicable legal mechanisms.

### **Changes to this policy**

We may update this policy from time to time. If such updates are not material, we may make such alterations without posting a specific notice on our website. If the changes are material and affects your rights or the way we process personal data, we will provide a specific notice on our website. Please review this privacy policy from time to time.