

GMpipe Corporate General Information Notice on the Processing of Personal Data

As GMpipe, we have prepared this information notice to inform our Visitors, Online Visitors, Customers, Potential Customers, Supplier Employees, and Supplier Officials about the processing, storage, and transfer of your personal data within the framework of the Personal Data Protection Law No. 6698 (“KVKK”) and related regulations and legal arrangements.

1. What Categories of Personal Data Do We Process and For What Purposes?

Your personal data is processed by GMpipe in accordance with the principles stipulated in Article 4.2 of KVKK:

- Lawfulness and fairness,
- Being accurate and up-to-date when necessary,
- Being processed for specific, explicit, and legitimate purposes,
- Being relevant, limited, and proportionate to the purposes for which they are processed,
- Being retained for the period stipulated in the relevant legislation or the period required for the purpose for which they are processed.

Personal data may be processed within the scope of the business relationships we have established and continue to establish with our business partners for the purposes outlined below (a person may fall into more than one category).

A. Visitors

The identity information (e.g., name, surname) and physical space security information (e.g., camera recordings) of our visitors will be processed for the purposes of:

- Creating and tracking visitor records,
- Ensuring physical space security.

B. Online Visitors

The transaction security information (e.g., your IP address), marketing information (e.g., shopping history information, cookie records), and (if you provide them to us) identity

information and contact information (e.g., name, surname, email address) of our online visitors using our website will be processed for the purposes of:

- Ensuring compliance with the law,
- Managing information security processes,
- Conducting communication activities,
- Providing information to authorized persons, institutions, and organizations,
- Ensuring access to our website via the internet.

C. Customers

The identity information, contact information, customer transaction information (e.g., order information), physical space security information, financial information (e.g., balance sheet information), legal transaction information, marketing information (e.g., shopping history information) of our individual customers or the representatives and/or employees of our corporate customers will be processed for the purposes of:

- Ensuring compliance with the law,
- Conducting finance and accounting works,
- Conducting/inspecting business activities,
- Conducting logistics activities,
- Conducting after-sales support services for goods/services,
- Conducting sales processes of goods/services,
- Conducting marketing analysis studies,
- Managing contract processes,
- Providing information to authorized persons, institutions, and organizations,
- Ensuring physical space security,
- Resolving legal disputes,
- Conducting storage and archiving activities,
- Managing risk processes,
- Conducting loyalty processes to the company/products/services,
- Conducting communication activities.

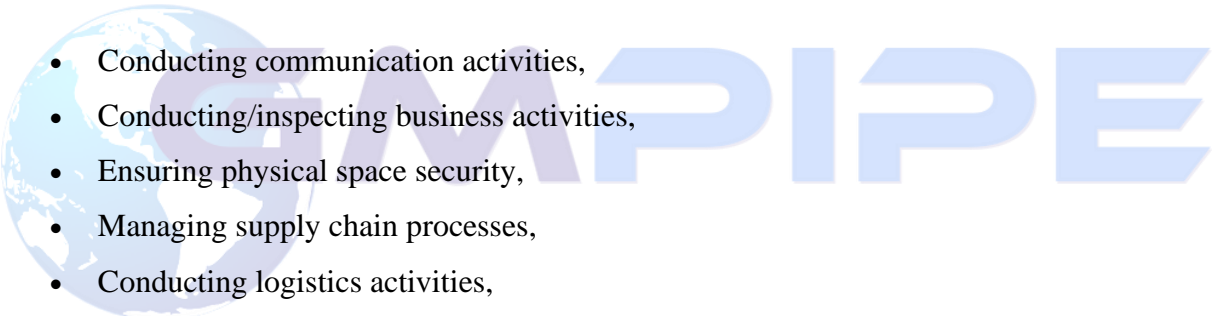
D. Potential Customers

The identity information, contact information, customer transaction information, physical space security information, marketing information of our potential individual customers or the representatives and/or employees of our potential corporate customers will be processed for the purposes of:

- Managing sales processes of goods/services,
- Managing contract processes,
- Ensuring physical space security,
- Conducting marketing analysis studies.

E. Supplier Employees

The identity information, contact information, physical space security information, professional experience information (e.g., in-service training information) of our supplier employees will be processed for the purposes of:

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- Conducting communication activities,
 - Conducting/inspecting business activities,
 - Ensuring physical space security,
 - Managing supply chain processes,
 - Conducting logistics activities,
 - Ensuring compliance with the law,
 - Conducting occupational health/safety activities.

F. Supplier Officials

The identity information, contact information, physical space security information, customer transaction information, financial information, marketing information, legal transaction information of our individual suppliers or the representatives of our corporate suppliers will be processed for the purposes of:

- Conducting/inspecting business activities,
- Managing purchasing processes of goods/services,
- Conducting finance and accounting works,
- Managing contract processes,
- Managing investment processes,

- Ensuring physical space security,
- Conducting and following legal works.

2. What Are the Methods of Collecting Your Personal Data?

Your personal data, as categorized above, are collected through physical means such as order forms, contracts, visitor forms, or through information systems and electronic devices (e.g., telecommunication infrastructure, computers, and phones), third parties (e.g., KKB and Findeks), our website, and other documents declared by the relevant person through automatic or non-automatic means.

3. What Is the Legal Basis for Collecting Your Personal Data?

Your personal data is processed by GMpipe in accordance with the following legal reasons stipulated in Article 5 of KVKK:

- Explicitly stipulated in laws,
- Necessary for the establishment or performance of a contract, provided that it is directly related to the establishment or performance of the contract,
- Necessary for the data controller to fulfill its legal obligation,
- Necessary for the establishment, exercise, or protection of a right,
- Necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

4. Do We Transfer Your Personal Data to Third Parties?

- Personal data of our visitors may be shared with law enforcement and judicial authorities for the resolution of legal disputes and when requested as required by relevant legislation.
- Personal data of our online visitors may be shared with judicial authorities and authorized public institutions and organizations for the resolution of legal disputes and when requested as required by relevant legislation.
- Personal data of our customers may be transferred to authorized public institutions and organizations within the scope of legal regulations, for the purpose of ensuring compliance with the law, following and conducting legal works, providing information to authorized persons, institutions, and organizations, conducting/inspecting business

activities, managing risk processes, ensuring proper fulfillment of our services to community companies, IT companies, suppliers, cargo companies, insurance companies, banks, and our financial advisor. Additionally, the said personal data may be transferred to the law firm we receive service from and judicial authorities for use as evidence in future legal disputes.

- Personal data of our potential customers may be transferred to the law firm we receive service from and judicial authorities for use as evidence in future legal disputes.
- Personal data of our supplier employees may be transferred to authorized public institutions and organizations within the scope of legal regulations, for the purpose of ensuring compliance with the law, following and conducting legal works, providing information to authorized persons, institutions, and organizations, conducting/inspecting business activities, ensuring proper fulfillment of our services to community companies, IT companies, suppliers, cargo companies, banks, and our financial advisor. Additionally, the said personal data may be transferred to the law firm we receive service from and judicial authorities for use as evidence in future legal disputes.
- Personal data of our supplier officials may be transferred to authorized public institutions and organizations within the scope of legal regulations, for the purpose of ensuring compliance with the law, following and conducting legal works, providing information to authorized persons, institutions, and organizations, conducting/inspecting business activities, ensuring proper fulfillment of our services to community companies, IT companies, suppliers, cargo companies, banks, and our financial advisor. Additionally, the said personal data may be transferred to the law firm we receive service from and judicial authorities for use as evidence in future legal disputes.

5. Do We Transfer Your Personal Data Abroad?

As GMpipe, we do not transfer your personal data abroad.

6. How Can You Exercise Your Rights Regarding Your Personal Data?

You can submit your requests within the scope of Article 11 of KVKK, which regulates the rights of data subjects, to GMpipe through the "Data Controller Application Form" prepared to facilitate your application at "www.gm-pipe.com/kvkk".