# CLARIFICATION TEXT FOR EMPLOYEES REGARDING CAMERA SYSTEMS USED IN COMPANY VEHICLES

This Clarification Text has been prepared by Quad Plus Otomasyon Hizmetleri Limited Şirketi (the "Company"), acting in its capacity as the data controller, within the scope of Article 10 of the Personal Data Protection Law No. 6698 ("KVKK") and the Communiqué on the Principles and Procedures to Be Followed in the Fulfilment of the Obligation to Inform, regarding personal data processed through camera systems used in Company vehicles.

## OUR IDENTITY AS THE DATA CONTROLLER

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| Title | Quad Plus Otomasyon Hizmetleri Limited Şirketi |
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Detailed information regarding the matters set forth in this Clarification Text can be accessed via the KVKK link available on our website at https://www.quadplus.com.tr/

## A. WHAT PERSONAL DATA IS PROCESSED AND FOR WHAT PURPOSES?

Within the scope of the camera systems used in Company vehicles, video recordings of the external surroundings of the vehicle and location data that may be associated with such recordings are processed. The camera system may generate loop recordings throughout the period of vehicle use and may also record while the vehicle is parked as part of its parking protection functions. The devices may also have an audio recording feature, which may be enabled or disabled by the user directly through the device.

Such personal data are processed for the following purposes:

- Ensuring vehicle and driving safety,
- Serving as evidence in the event of potential accidents, damage, and legal disputes,
- Protecting Company assets,
- Ensuring that vehicle usage processes are carried out safely,
- Ensuring business continuity and the security of operational processes,
- Recording potential judicial incidents and, where necessary, providing information to authorized institutions and organizations,
- Ensuring that activities are carried out in compliance with the applicable legislation.

## B. BY WHICH METHODS AND ON WHAT LEGAL GROUNDS ARE PERSONAL DATA COLLECTED?

- Your personal data are collected by automated means through the camera systems used in Company vehicles and the mobile applications associated with these systems.
- Your personal data are processed in accordance with the data processing conditions specified in Article 5 of the Personal Data Protection Law No. 6698, based on the following legal grounds:
- Data processing is necessary for the establishment, exercise, or protection of a right,
- Data processing is necessary for the legitimate interests of the data controller, provided that such processing does not harm the fundamental rights and freedoms of the data subject.
- Your personal data are processed for the purposes of ensuring vehicle and driving safety, serving as evidence in the event of potential accidents and legal proceedings, and protecting Company assets.

## C. TO WHOM AND FOR WHAT PURPOSES PERSONAL DATA ARE TRANSFERRED

Your personal data processed within the scope of the camera systems used in Company vehicles are accessible to a limited number of authorized personnel and may only be viewed by persons duly authorized as required by their duties. In this context, authorized personnel within the Human Resources and Administrative Affairs Directorate may access the recordings.

Your personal data in the form of camera footage may be transferred for the fulfilment of the purposes specified in this Clarification Text, including ensuring security, fulfilling obligations arising from the applicable legislation, and resolving potential legal disputes, to the following recipients:

- **Authorized Public Institutions and Organizations and Judicial Authorities:** In the event of a traffic accident, theft, criminal investigation, or other judicial or administrative dispute, solely for the purpose of fulfilling our legal obligations arising from the applicable legislation and limited to the official requests of such authorities, including Prosecutor's Offices, Courts, and the General Directorate of Security,
- **Legal Counsel, Attorneys, and Consultants:** Solely for the purposes of protecting the Company's legal rights, establishing or exercising a right, exercising the right of defence, or conducting a potential lawsuit or complaint process,
- **Service Providers (Data Processors):** To our business partners providing the technical infrastructure, maintenance and repair services, or server/cloud storage services for the camera system, provided that the necessary data security measures are implemented.

Your personal data may be transferred within the scope of the personal data transfer conditions and purposes specified in Article 8 of the KVKK. Except in the circumstances listed above, your personal data are not shared with third parties and are not transferred abroad.

Authorized personnel are obliged to protect the confidentiality of the personal data they access, and the necessary technical and administrative measures are implemented in this regard.

## D. DATA PROCESSING PERIOD AND RETENTION PERIOD

Your personal data are processed for the periods prescribed under the applicable legislation to which the data controller is subject and for the duration required by the purpose of processing, limited to the purposes specified in this Clarification Text. In the event of any amendments to the data processing periods stipulated under the applicable legislation, the newly determined periods shall apply.

In accordance with the principle of purpose limitation, your personal data are retained only for the period necessary to fulfil the purposes specified in this Clarification Text. Upon expiry of the applicable period, your personal data are deleted, destroyed, or anonymized in accordance with the Company's Personal Data Retention and Destruction Policy.

## E. YOUR RIGHTS AS A DATA SUBJECT

Your requests regarding your rights as personal data subjects will be concluded free of charge as soon as possible and no later than 30 (thirty) days, depending on the nature of the request, provided that you submit your request to the data controller through the methods specified in this Clarification Text. However, if a fee is stipulated by the Personal Data Protection Board, the fee specified in the applicable tariff will be charged by the data controller.

Data subjects whose personal data are processed have the following rights:

- **a.** To learn whether their personal data are processed,
- **b.** To request information if their personal data have been processed,
- **c.** To learn the purpose of processing their personal data and whether such data are used in accordance with their intended purpose,
- **d.** To know the third parties to whom their personal data are transferred domestically or abroad,
- **e.** To request the correction of their personal data if they have been processed incompletely or inaccurately and to request that the action taken in this regard be notified to third parties to whom the personal data have been transferred,
- **f.** To request the deletion or destruction of their personal data where the reasons requiring their processing cease to exist, despite the data having been processed in accordance with the Law and other applicable legal provisions, and to request that the action taken in this regard be notified to third parties to whom the personal data have been transferred,
- **g.** To object to the occurrence of a result against the data subject arising from the analysis of the processed data exclusively through automated systems,
- **h.** To request compensation for damages incurred as a result of the unlawful processing of personal data.

Pursuant to Article 13, paragraph 1 of the Law, you may submit your request regarding the exercise of the above-mentioned rights to us in writing or through other methods determined by the Personal Data Protection Board. In accordance with the Law, your application must be submitted to the data controller in writing.

## F. APPLICATION TO THE DATA CONTROLLER

As personal data owners (“data subjects”), you may exercise your rights set forth under Article 11 of the Law and submit your requests to us by completing the personal data application form available at https://www.quadplus.com.tr/ in accordance with the procedures specified in the form and sending it, in line with the Communiqué on the Principles and Procedures for Application to the Data Controller, to the address “IşıktepeOSB Mah. Kahverengi Cad. No:14 16215 Nilüfer, Bursa” or in writing via e-mail to info@quadplus.com.tr .

Depending on the nature of your request, your application will be concluded free of charge as soon as possible and no later than thirty days. However, where the process entails an additional cost, a fee may be charged by the Company in accordance with the tariff determined by the Personal Data Protection Authority.