

CLARIFICATION TEXT ON THE PROCESSING OF VISITOR PERSONAL DATA

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.

OUR IDENTITY AS THE DATA CONTROLLER

Title	Quad Plus Otomasyon Hizmetleri Limited Şirketi
Address	IşıktepeOSB Mah. Kahverengi Cad. No:14 16215 Nilüfer, Bursa
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Website	www.quadplus.com.tr

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?

Your personal data, including identity (name-surname, signature), contact (phone number), vehicle license plate, entry-exit time, and data within the category of physical space security, are processed during your visits to the Company premises for the following purposes:

- Ensuring the security of physical premises,
- Maintaining visitor records,
- Carrying out communication activities with data subjects whose personal data is processed,
- Preventing unauthorized entry and access,
- Ensuring control of entries and exits,
- Storing and delivering lost and found items within the scope of private security activities,
- Carrying out event, organization, and social media processes to be organized/managed by the data controller,
- Creating and tracking visitor records,
- Managing visitor relations processes,
- Ensuring information security and accuracy processes,
- Preventing potential judicial incidents and events within the workplace, recording such incidents and events, and informing the relevant and authorized public institutions and organizations in this regard,
- Conducting audit/ethics activities,
- Ensuring that activities are carried out in compliance with the legislation.

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

- Your personal data are processed by the Company in accordance with the data processing conditions set forth in the Law, primarily within the scope of the Personal Data Protection Law No. 6698 and the Law on Private Security Services No. 5188.
- Pursuant to the Law, visitors' data may be processed for the purpose of ensuring physical premises security. During your physical visits, if you visit the office, your identity data are requested in order to prevent unauthorized access and to ensure that entry and exit controls are carried out from a single point. Your identification is requested by personnel bound by a confidentiality obligation, and any data on the identification document other than your name and surname are subject to retention only for the duration of your visit.
- The Company processes your data in order to fulfill its obligations arising from Law No. 6698 and based on the legal grounds specified in Article 5 of the KVKK, namely: where it is explicitly stipulated by law, where data processing is necessary for the establishment, exercise, or protection of a right, and where data processing is necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

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

Access to records processed, recorded, and stored in digital environments is limited to a restricted number of Company employees. Authorized personnel within the Security Unit and the Information Technologies Department have access to such records. These authorized individuals undertake to maintain the confidentiality of the data they access under a Confidentiality Undertaking.

Your personal data are transferred by the Company within the scope of the provisions on the transfer of personal data set forth in Article 8 of the Law. The aforementioned data may be transferred to security and technical support service providers for the purpose of ensuring the provision of services. Within the framework of the applicable laws, your data may also be transferred to authorized public institutions and organizations in order to fulfill the legal obligations of the data controller, and, in the event of any dispute, to judicial and administrative authorities and to our legal counsel.

All visual and audio recordings obtained within the scope of events and organizations carried out under the responsibility of the data controller may be shared publicly on relevant online platforms only with your explicit consent.

D. DATA PROCESSING PERIOD AND RETENTION PERIOD

Your personal data shall be processed in accordance with the data processing and statute of limitations periods stipulated under all applicable laws and secondary legislation to which the data controller is subject, limited to the purposes specified in this Clarification Text. In the event of any amendments to the data processing periods set forth in the applicable laws, the newly determined periods shall apply.

In line with the principle of purpose limitation, your personal data are processed only for the period necessary to fulfill the purposes described in this Clarification Text and, in any case, for the duration required by the practices of the data controller and the customs of commercial life. Upon the expiry of such periods, your personal data are deleted, destroyed, or anonymized in accordance with the destruction policy.

Accordingly, in line with the Personal Data Retention and Destruction Policy determined by the Company, the retention period for camera recordings is limited to 15 days, and the retention period for visitor undertakings is limited to 6 months. Thereafter, camera recordings are deleted and visitor undertakings are destroyed.

E. YOUR RIGHTS AS A DATA SUBJECT

As personal data owners, your requests regarding your rights 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 set out in this Clarification Text. However, if a fee is stipulated by the Personal Data Protection Board, the fee determined in the tariff set by the data controller will be charged.

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

- a. To learn whether personal data are processed,
- b. To request information if their personal data have been processed,
- c. To learn the purpose of processing of personal data and whether they are used in accordance with their purpose,
- d. To know the third parties to whom personal data are transferred domestically or abroad,
- e. To request the correction of personal data if they are incomplete or inaccurately processed and to request that the transaction carried out in this context be notified to third parties to whom the personal data have been transferred,
- f. To request the deletion or destruction of personal data in the event that the reasons requiring their processing cease to exist, despite having been processed in accordance with the Law and other relevant legal provisions, and to request that the transaction carried out in this context be notified to third parties to whom the personal data have been transferred,
- g. To object to the occurrence of a result against the person himself/herself by analyzing the processed data exclusively through automated systems,
- h. To request compensation for damages in case of damage due to unlawful processing of personal data.

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

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/tr/kvkk-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 “Işıktepe OSB Mah. Kahverengi Cad. No:14 16215 Nilüfer, Bursa” or in writing via e-mail to info@quadplus.com

Depending on the nature of your request, your application will be concluded as soon as possible and no later than thirty (30) days, free of charge. However, if the process requires an additional cost, a fee may be charged in accordance with the tariff determined by the Personal Data Protection Authority.