

1. FOREWORD

İSGOLD Altın Rafinerisi Anonim Şirketi (“İSGOLD”), acting as the Data Controller, adopts this **Personal Data Protection and Processing Policy** in order to ensure that personal data are processed in full compliance with the Law No. 6698 on the Protection of Personal Data (“Law”), the secondary legislation enacted or to be enacted pursuant to the Law (including regulations, communiqués, and circulars), as well as the binding decisions of the Personal Data Protection Board.

This Policy has been prepared to set out the principles and procedures regarding the processing of personal data within the scope of the website operated by İSGOLD at <https://www.isgold.com/>, in accordance with the applicable legislation.

2. INFORMATION REGARDING THE DATA CONTROLLER

- **Company Title:** İSGOLD Altın Rafinerisi Anonim Şirketi
- **Trade Registry Number:** 791442
- **MERSIS Number:** 0480050389300022
- **Address:** İkitelli OSB Mahallesi, Marmara Sanayi Sitesi, S Block No:5, Küçükçekmece / İstanbul, Türkiye
- **Phone:** +90 212 494 48 14
- **E-mail:** info@isgold.com
- **Registered Electronic Mail (KEP) Address:** isgoldaltin@hs01.kep.tr

İSGOLD Altın Rafinerisi Anonim Şirketi acts as the **Data Controller** within the scope of the Law.

3. APPLICATION OF THE POLICY

3.1. Personal Data and Purposes of Processing

In connection with visits to the website operated by İSGOLD at <https://www.isgold.com/>, personal data may be processed for purposes including, but not limited to, conducting marketing activities related to products and services, establishing and maintaining communication with customers, managing customer relations, ensuring the accuracy and up-to-dateness of contact information, meeting customer needs and ensuring customer satisfaction, planning and carrying out customer satisfaction and corporate communication activities, enabling relevant

PREPARED BY:
Integrated Management
Systems Representative

REVIEWED BY:
Internal Control and Supply
Chain Compliance Officer

APPROVED BY:
Board of Directors

persons to benefit from products and services, and carrying out customer acquisition activities.

In this context, where provided by the relevant persons, contact data (such as telephone number and e-mail address), transaction security data (such as IP address) for the purpose of complying with statutory data retention obligations, location data for the provision of content and services appropriate to the user's location as well as for offering recommendations and advertisements, and cookie records for the purposes of advertising, promotion, and marketing of products and services and ensuring customer satisfaction (details of processed cookies are available in the Cookie Policy) may be processed.

All such personal data are processed by İSGOLD in accordance with the principles of lawfulness and fairness, and in a manner that is relevant, limited, and proportionate to the specified purposes, in line with the limits set forth under the Law.

3.2. Disclosure of Personal Data

Personal data may be transferred, for the purposes set forth above and in accordance with the conditions stipulated under Article 8 of the Law, to legally authorized public institutions and organizations, judicial and administrative authorities, accounting and financial advisors, information technology service providers, as well as software and IT infrastructure companies from which services are obtained for the conduct of the Company's digital operations, where required by applicable legislation or upon lawful request.

3.3. Methods and Legal Bases for the Collection of Personal Data

Personal data are collected electronically through the website <https://www.isgold.com/>, either directly from the data subjects and/or from third parties. Such personal data may be processed based on the legal grounds set forth under Article 5/2 of the Law, including:

- (c) where processing is necessary for the data controller to fulfill its legal obligations;
- (f) where processing is necessary for the legitimate interests of the data controller, provided that such processing does not violate the fundamental rights and freedoms of the data subject.

PREPARED BY: Integrated Management Systems Representative	REVIEWED BY: Internal Control and Supply Chain Compliance Officer	APPROVED BY: Board of Directors
--	--	---

4. RIGHTS OF DATA SUBJECTS

Pursuant to Article 11 of the Law No. 6698 on the Protection of Personal Data ("KVKK"), everyone has the right to submit a request to İSGOLD Altın Rafinerisi Anonim Şirketi, acting as the Data Controller, by using the Data Controller Application Form, regarding the following matters:

- Learn whether personal data are processed;
- Request information if personal data have been processed;
- Learn the purpose of processing personal data and whether such data are used in accordance with their purpose;
- Know the third parties to whom personal data are transferred domestically or abroad;
- Request the correction of personal data if they are processed incompletely or inaccurately;
- Request the deletion or destruction of personal data, pursuant to Article 7 of the KVKK, in cases where the reasons requiring their processing cease to exist;
- Request notification of the transactions carried out pursuant to subparagraphs (e) and (f) to third parties to whom personal data have been transferred;
- Object to the occurrence of a result against the data subject arising from the analysis of processed data exclusively through automated systems;
- Request compensation for damages in the event that personal data are processed unlawfully.

5. APPLICATION METHOD

Based on your rights set forth in Article 11 of the Law explained above, you may submit your requests in writing or via registered electronic mail (KEP), secure electronic signature, mobile signature, or by using the electronic mail address previously notified to İSGOLD and registered in our system.

KEP:isgoldaltin@hs01.kep.tr

E-mail: compliance@isgold.com or info@isgold.com

Your application must include the following information:

- Name and surname, and signature if the application is submitted in writing,
- Turkish Identification Number for Turkish citizens; nationality, passport number, or identification number (if any) for foreign nationals,
- Residential or workplace address for notification purposes,

PREPARED BY: Integrated Management Systems Representative	REVIEWED BY: Internal Control and Supply Chain Compliance Officer	APPROVED BY: Board of Directors
--	--	---

d) If available, electronic mail address, telephone number, and fax number for notification,

e) Subject of the request.

Applications that do not include the above-mentioned information may be rejected by İSGOLD Altın Rafinerisi A.Ş.

Your requests included in the application will be concluded as soon as possible and no later than thirty (30) days, depending on the nature of the request.

6. POLICY AMENDMENTS AND UPDATES

İSGOLD reserves the right to make amendments to this Policy based on the Law, secondary legislation, and decisions of the Personal Data Protection Board. Any amendments made to this Policy and the updated version shall enter into force immediately as of the date they are published on <https://www.isgold.com/>.

PREPARED BY: Integrated Management Systems Representative	REVIEWED BY: Internal Control and Supply Chain Compliance Officer	APPROVED BY: Board of Directors
--	--	---