



SILGAN ÖNTAŞ AMBALAJ SANAYİ VE TİCARET A.Ş.
POLICY ON THE PROTECTION AND PROCESSING
OF
PERSONAL DATA

1. INTRODUCTION

As Silgan Öntaş Ambalaj Sanayi ve Ticaret A.Ş. (“Company “), we care about to the legal processing and protection of personal data in accordance with the the Law on the Protection of Personal Data no. 6698 (“Law”). For this reason, we are moving with care in all our planning and activities. With this policy, our Company fulfills the obligation of lighting under the Law and sets the basic rules for the processing and protection of personal data.

1.1. Purpose of Policy

The main purpose of this Policy is to provide information on the systems for the processing and protection of personal data in accordance with the law and the purpose of the Law and to inform the persons whose personal data are processed by our Company. In this way, it is aimed to ensure full compliance with the legislation in the processing and protection of personal data by our Company and to carry the protection of all rights of personal data subjects arising from the legislation on personal data.

1.2. Scope of Policy and Personal Data Subjects

This Policy is intended for real persons whose personal data is processed by our Company in automatic or non-automated ways of a part of any data logging system. This Policy shall in no way be applied to legal entities and legal entity data.

In case of any conflicts between the relevant legislations in force and this Policy, the legislation clauses shall be applied primarily. Should other policies or regulations be available apart from this Policy as regards to more special subjects, clauses with special provisions shall be applied primarily. By no means the clauses of other policies or documents that conflict with this Policy and legislations shall be applicable.

The personal data subjects within the scope of this Policy are the real person who we are in any kind of relationship, for business cooperation relation with, customers, potential customers, company authorized persons, employee candidates, visitors, employees of the entities we are in a relation for business cooperation relation with and other persons whose personal data are being processed by our Company.

2. PROCESSING AND TRANSFERING PERSONAL DATA

2.1. General Principles in Processing Personal Data

The Company shall process the personal data in accordance with the procedures and principles set forth in the Law and this Policy. The Company acts on the following principles when processing Personal Data:

- **Processing of personal data in accordance with the rules of law and in good faith:** The Company acts in accordance with the Law, secondary regulations and general principles of Law in the processing of your personal data. The Company is committed to processing personal data in a limited manner and to take into account the reasonable expectations of data subjects.
- **Processing of personal data for specific, explicit and legitimate purposes:** Prior to each individual data processing activity, the Company shall determine the purposes of data processing and ensure that these objectives are not in violation of the Law.
- **Relevant, limited and proportional to the purposes for which they are processed:** Personal data shall be processed with regards and limited to the purposes determined by the Company and any processing that is not relevant to the scope of such purposes shall be avoided. Only the personal data that is necessary for realizing an objective shall be collected from the data subjects.

- **Keeping for duration necessary for the purposes for which the data are processed or foreseen under the relevant legislation:** Our Company shall keep personal data only for a duration stated under the applicable legislation or necessary for the purposes for which the data are processed.

2.2. Conditions of Processing Personal Data

Personal data shall be processed by our Company in compliance with one or more conditions set forth by the Law. The purposes for processing personal data by our Company are specifically indicated in Section 3.1. . Our Company processes personal data in compliance with the provisions prescribed by the Law. In this context, personal data could be processed under the following conditions;

- If explicit consent of data subject is available,
- If processing is specifically envisaged under the laws,
- If processing is necessary to protect the vital interests or bodily integrity of the data subject or a third person if the data subject is not in a condition to express his/her consent due to actual impossibility,
- If processing is necessary for execution or a performance of a contract to which data subject is a party,
- If processing is necessary for our Company to comply with a legal obligation to which the data controller is subject,
- If personal data has been made public by the data subject,
- If processing is necessary for the establishment, exercise or protection of a right,
- If processing is necessary for the purpose of the legitimate interests of our Company provided that such interest does not harm the fundamental rights and freedoms of the data subject.

2.3. Conditions of Processing Special Categories of Personal Data

The Law states that special measures can be brought by the Board for processing special categories of data. In that regard, the measures to be determined by the Board will be taken. The conditions under which special categories of data can be processed by our Company are indicated under section 3.1 below;

- If explicit consent of data subject is available,
- When special categories of data except personal data relating to health and sex life (racial or ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, dress and appearance, memberships to any association, foundation or trade union, criminal conviction and security measures and biometric data and genetic data) are envisaged under laws,
- For personal data relating to health and sex life, only by persons who are under the obligation of confidentiality or authorized institutions and organizations for the purposes of protection of public health, preventive medicine, medical diagnosis, conducting of nursing services, planning of the health services and financing.

2.4. Conditions for Transfer of Personal Data to Third Parties

The Company may transfer personal data it processes in line with the lawful personal data processing purposes to third parties. While the company shares personal data, it complies with the regulations set forth in the Law.

Our Company may transfer the personal data to third parties on one or more of personal data processing conditions (i.e. Section 2.2.).

Our Company may also transfer special categories of data to third parties provided that it takes the measures determined by the Board and necessary security measures and by taking utmost care, and that conditions for processing special categories of data (i.e. Section 2.3.) are available.

2.5. Conditions for Transfer of Personal Data to Abroad

The Company may transfer personal data to third parties residing abroad by taking necessary security measures.

Personal data are transferred by the Company to foreign countries where it is deemed by the Board that adequate protection is provided in this country or to foreign countries where adequate protection is not provided and on the condition that the Board gives permission and the data controllers both in Turkey and in the country to which data is transferred undertake to provide sufficient protection in writing.

The Company may transfer personal data to Foreign Countries with Sufficient Protection or to Foreign Countries Where the Data Controller Undertakes to Provide Adequate Protection by taking measures determined by the Board and the necessary security measures provided that one of the conditions for processing personal data and/or special categories of data are available.

3. CATEGORIES OF PERSONAL DATA, PROCESSING AND TRANSMISSION PURPOSES

3.1. Personal Data Categories

The personal data, categorized by the Company below, is processed in accordance with the personal data processing requirements of the Law and the relevant legislation:

- **Identity Information:** Any information provided on the documents such as driver's license, identity document, residency, passport, advocate identity, marriage records which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system and social security number, tax number, signature information etc.
- **Contact Information:** Information such as phone number, address, e-mail fax number, IP address etc. which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
- **Location Data:** Information locating the location of the vehicles and devices of the Company that are used by our employees or by the employees of institutions that we are in cooperation with; such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
- **Security Information of Activity:** Personal data processed for the purposes of ensuring administrative, legal and commercial security of both our employees and our Company during the conduct of commercial activities of our Company; such information which explicitly belongs to an identified or identifiable real person and are a part of the data recording system.
- **Information on Family Members and Relatives:** Information relating to the family member and relatives of the data subject that are processed for the purposes of protecting the legal interests of the Company and the data subject, such information which explicitly belongs to an identified or identifiable real person and are a part of the data recording system.

- **Physical Premises Security Information:** Personal data relating to the records and documents obtained when entering to physical premises and during the stay in such premises; such information which explicitly belongs to an identified or identifiable real person and are a part of the data recording system.
- **Visual and Audio Information:** It is clear that the identity belongs to a specific or identifiable natural person; data from photographs and camera records (except for entries in the Physical Space Security Information), audio recordings and documents that contain personal data.
- **Financial Information:** Personal data processed with respect to indicating all financial information, document and records generated based on the nature of the legal relation established between our company and the data subject; such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system and financial data such as bank account number, credit card information, income information.
- **Personnel Information:** Any personal data processed for obtaining the information that is required for the establishing the basis of personnel rights of our employees or real persons having a working relation with our Company; such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by nonautomatic means as a part of the data recording system.
- **Legal Procedure and Compliance Information:** Your personal data processed for the purposes of determining and following our legal receivables and rights and performance of our obligations and within the scope of compliance with the legal obligations of our Company and Company policies.
- **Special Categories of Personal Data:** Data stated under Article 6 of Law no. 6698; such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
- **Request/ Complaint Management Information:** Personal data relating to the receipt and evaluation of all requests or complaints addressed to our Company, such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
- **Customer Data:** Information obtained and generated as a result of the operations conducted by our business units for our business operations such information.
- **Customer Process Information:** Information such as records of the use of goods and services and instructions and requests necessary for customer's use of goods and services, such information which explicitly belongs to an identified or identifiable real person and are a part of the data recording system.
- **Candidate Employee Information:** Personal data processed relating to the candidates who have applied to our Company in order to become an employee or are deemed as candidate employee due to the requirements of the human resources of our company as per the customs of trade and principles of good faith; such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
- **Supervision and Inspection Information:** Your personal data processed within the scope of compliance with the legal obligations of our Company and Company policies, such information which explicitly belongs to an identified or identifiable real person and processed

wholly or partly by automatic means or by non-automatic means as a part of the data recording system.

- **Marketing Information:** Personal data processed for the purposes of personalization and promoting the usage habit, preferences and requirements, reports and evaluations produced as a result of such processing such information.
- **Risk and Commercial Reputation Management Information:** Personal data processed by means in accordance with legal principles, customs of trade and principles of good faith for us to manage our commercial, technical and administrative risks such information which explicitly belongs to an identified or identifiable real person and are a part of the data recording system.

3.2. Purpose of Processing and Transferring Personal Data

Personal Data shall be processed in accordance with the personal data processing requirements set out in Articles 5 and 6 of the Law, with the law and the purpose of the Law and with and without limitation the following purposes of the Company;

- The best planning and implementation of human resources policies,
- The correct planning, execution and management of commercial partnerships and strategies,
- Ensuring the legal, commercial and physical security of his / her partners and business partners,
- Ensuring institutional functioning, planning and execution of management and communication activities,
- To ensure that Personal Data Holders are benefited from their products and services in the best way and that they are customized according to their demands, needs and requests,
- Ensuring the highest level of data security,
- Creating databases,
- Developing the services provided on the website and eliminating the errors on the site,
- To contact the Personal Data Holders who convey their requests and complaints and to provide demand and complaint management,
- Event management,
- Management of relations with business partners or suppliers,
- Implementation of personnel procurement processes,
- Execution / monitoring of financial reporting and risk management operations,
- Execution / follow-up of company legal affairs,
- Realization of works for the preservation of reputation,
- Managing investor relations,
- Providing information to the competent authorities from the legislation,
- Creating and tracking visitor records.

These processes could require an explicit consent depending on the concrete case. On that occasion, explicit consent procedures must be applied to the data subjects within the scope of the Law. Should the data subject does not give his/her explicit consent, then the personal data can be processed in accordance with the conditions stated within the scope of the Law and for the purposes compliant therewith.

3.3. Persons to Transfer Personal Data

Your Personal Data may be transferred to the following categories of persons, managed by this Policy in accordance with the law and the purpose of the Law, for the following purposes:

Persons with Data Transfer	Data Transfer Purpose
Company's business partners	In order to ensure the fulfillment of the establishment objectives of the business partnership established for the purposes of carrying out various projects and carrying out the commercial activities of the Company,
Supplier	In accordance with the instructions received from the Company and on the basis of the agreement between the Company and the Company, for the purpose of obtaining services outsourced to the service providers for the purpose of continuing the commercial activities of the Company,
Company Shareholders	Pursuant to the provisions of the relevant legislation, for the purposes of the Company's activities under corporate law, event management and corporate communication processes,
Company Officials	In accordance with the provisions of the relevant legislation, with purposes for to design the Company's strategies for the commercial activities, to ensure the highest level of management and to supervision.
Legally Authorized Public Institutions and Organizations	For the purposes requested by the relevant public institutions and organizations within the legal competence
Legally Authorized Legal Persons	For the purpose of the request of the relevant private legal persons in accordance with the legal authority in accordance with the provisions of the legislation

4. THE METHOD OF COLLECTION OF PERSONAL DATA AND THE LEGAL REASON AND ERASURE, DESTRUCTION AND ANONYMIZING AND MAINTAINING PERIOD

4.1. Method and Legal Reason of Collecting Personal Data

Within the scope of the Law, personal data is collected in various ways such as all kinds of verbal, written, electronic media, technical and other methods, call center, corporate website, mobile application and personal data shall be collected for the purposes of carrying out the objectives set forth in this Policy and/or for the fulfillment of the obligations arising from the Law within the framework of legal reasons, legislation, agreement and request and personal data is processed by the data processor who appointed by the Company.

4.2. Erasure, Destruction and Anonymizing of Personal Data

Although the personal data is processed in accordance with the Law, in the event that the reasons for the processing have disappeared, without prejudice to the provisions of other laws, the Company shall delete, destroy or anonymize the personal data ex officio or upon the request of the data owner (controller). This personal data shall be destroyed in a non-usable and non-recoverable manner. Accordingly, personal data is deleted or destroyed or anonymized from tools such as documents, files, CDs, diskettes, hard disks to which they are registered so that it cannot be re-used.

Pursuant to article 28 of the Law; anonymized data may be processed for research, planning and statistical reasons. Anonymized data shall not be deemed as "personal data" hence they are outside the scope of the Law.

4.3. Maintaining Period of Personal Data

Our Company maintain the personal data that it processes pursuant to the principles within the Law as per the durations envisaged by legislations. If such duration is not determined by legislations for

maintaining personal data, the personal data are kept until the termination of the purposes for which personal data are processed. In case duration is not determined by legislations for maintaining personal data, the durations for maintaining data shall be determined as per each purpose for data processing considering our Company applications and commercial practices. In that regard, the durations for maintaining data shall be determined by considering our Company applications and commercial practices.

Apart from the purposes for processing, personal data may be maintained for citing them as evidence in possible legal conflicts, asserting the relevant rights with respect to personal data or for forming a defense and for responding the information requests delivered from public authorities. Our Company shall erase, destroy or anonymize personal data following the expiration of said periods. Additionally, personal data may be erased, destroyed or anonymized upon data subject's request.

5. PERSONAL DATA PROTECTION

Our Company takes necessary technical and administrative measures for ensuring the security of personal data within, preventing unlawful access to personal data and unlawful processing of personal data as regards to article 12 of the Law, takes ultimate care as regards to protection of personal data and also may conduct audit.

In case the personal data processed are unlawfully accessed by third parties, our Company takes the utmost care to inform data subjects and the Board on the condition.

6. RIGHTS OF PERSONAL DATA SUBJECT, USING AND EVALUATION OF RIGHTS

6.1. Clarification of Personal Data Subject

Our Company shall inform data subjects regarding how their data shall be processed, during the collection of personal data pursuant to the obligation to provide information. In that regard, our Company informs data subjects at least on the points that identity of the personal data controller and of his representative, if any purposes of personal data processing, recipients to whom the personal data will be transferred, method and legal grounds of the personal data collection and rights of the data subjects.

6.2. Rights of Data Subjects

Personal data subjects are entitled to the following rights:

- Learn whether or not data relating to him/her are being processed;
- Request further information if his/her personal data have been processed;
- Learn the purpose of the processing of personal data and whether or not data are being processed in compliance with such purpose;
- Learn the third-party recipients to whom the data are disclosed within the country or abroad,
- Request rectification of the processed personal data which is incomplete or inaccurate and request such process to be notified to third persons to whom personal data is transferred.
- Request erasure or destruction of data in the event that the data is no longer necessary in relation to the purpose for which the personal data was collected, despite being processed in line with the Law no. 6698 and other applicable laws and request such process to be notified to third persons to whom personal data is transferred.
- Object to negative consequences about him/her that are concluded as a result of analysis of the processed personal data by solely automatic means,

- Demand compensation for the damages he/she has suffered as a result of an unlawful processing operation.

6.3. Data Subject's Use of Rights

Data subjects may forward their requests concerning their rights stated by the Law and mentioned above to our Company. In order to make an application you may fill in and forward the Application Form available at our Company's website. Special power of attorney issued by data subject on the name of relevant third party is required in order a third party to apply for and on behalf of data subject.

Insufficient application forms shall not be taken into examination by our Company. Our Company may request additional information and documents in order to verify the applicant is the subject of personal data or if the qualification of request cannot be understood from the content of application form.

6.4. Response Procedure and Time to Applications

Upon data subject's application to our Company, the request shall be replied by our Company as soon as possible and within 30 days at most, depending on the nature of the request. Upon this assessment, if the Company determines that fulfilment of the request shall not be possible, the request of the data subject shall be responded including its reasoning.

As a rule, our Company responds to data subject's requests free of charge. However, if additional cost is determined for the requested action, the costs determined within the tariff by the Board may be required from the applicant data subjects.

6.5. Right to Complain to the Personal Data Protection Board

In cases of the rejection of the application, inadequacy of the respond or not responding to the application within the specified period; data subject may file a complaint to the Board within thirty days as of learning the response of our Company and within sixty days as of the application in any event.

7. UPDATE, ADAPTATION AND CHANGES

7.1. Update and Compliance

This Policy, issued and published by the Company, is made available to the Personal Data Subjects and other related persons on the Company's website. The Company reserves the right to make changes to the Policy in line with the legal regulations.

Any changes made to this Policy shall be immediately reproduced in the text, and any changes shall be disclosed at the end of the Policy.

7.2. Changes

01/February/2019:	Personal Data Processing and Protection Policy is published.
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There is no previous change.

SİLGAN ÖNTAŞ AMBALAJ SANAYİ VE TİCARET A.Ş.

Kemalpaşa O.S.B. Mah. İzmir - Ankara Asfaltı Ansızca Kavşağı No : 307 Kemalpaşa – İZMİR

ANNEX:
DEFINITIONS

Explicit Consent	Consent related to a specific subject which is given freely upon informing.
Anonymization	Processing of personal data in such a way to make the linking of the data with another data of an identified or identifiable natural person impossible; i.e. techniques such as masking, aggregation, deterioration to prevent linking of data with a real person.
Personal Data Subject	Natural persons whose personal data are processed i.e. customers, employees.
Personal Data	Any information relating to an identified or identifiable natural person.; i.e. name-surname, ID number, e-mail, address, date of birth, credit card number. Hence processing of data relating to legal persons is not within the scope of the Law.
Special Categories of Personal Data	Data relating to an individual's racial or ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs; dress and appearance; memberships to any association, foundation or trade union; health or sex life; criminal conviction and security measures, biometric and genetic data.
Processing of Personal Data	Any operation which is performed upon personal data whether or partly by automatic means or otherwise than by automatic means which form part of a filing system, such as collection, recording, storage, retain, alteration, re-organization, disclosure, transfer, retrieval, making available, combination, or blocking.
Data Processor	Natural or legal persons who process personal data on behalf of and under the authority given by the data controller; i.e. an IT company that stores personal data that belong to customers of a company.
Data Controller	Any natural and legal person which determines the purposes and means of processing personal data and is responsible for the establishment and management of the storage where data are kept (data register system).