

**CLARIFICATION TEXT REGARDING THE PROCESSING OF PERSONAL DATA FOR
POTENTIAL PRODUCT OR SERVICE RECIPIENTS (POTENTIAL CUSTOMERS)**

Data Controller: Nitromak Dnx Kimya Sanayii A.Ş.
Via Flat İş Merkezi Beştepeler Mah. Nergis Sokak No: 7/2 Ofis No: 52
Söğütözü Yenimahalle Ankara

As Nitromak Dnx Kimya Sanayii A.Ş. ("**Nitromak**"), the Data Controller; we hereby prepared this Clarification Text to inform you, **our potential product and service recipients (potential customers)**, about the processing of your personal data as per the scope of the Law on the Protection of Personal Data No. 6698 ("**PDPL**"), the Communiqué on the Procedures and Principles to be Complied with in Fulfilling the Obligation of Disclosure and the relevant legislation.

1. Which of your Personal Data is Processed?

ID Information	
Processed Personal Data	<ul style="list-style-type: none">• Name surname• Tax identification number• Tax Administration• Current account code• Blasting project code• Signature Circulars• Trade Registry Newspaper Information• Signature
Purposes of Processing Personal Data	<ul style="list-style-type: none">• Execution of goods / services sales processes• Execution of marketing processes of product / services• Organization and Event Management• Execution of Communication Activities• Execution / supervision of business activities
Legal Reasons for Processing Personal Data	<p>Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:</p> <ul style="list-style-type: none">• Provided that it does not harm the fundamental rights and freedoms of the data subject, based on the legal reason that data processing is mandatory for the legitimate interests of the data controller, for the purposes of execution of marketing processes of products/services, organization and activity management, execution of goods/services sales processes,• Based on the legal reason that the data subject provided their explicit consent, for the purposes of execution of

	marketing processes of product/ services, organization and activity management, execution/supervision of communication activities, execution/supervision of business activities.
Personal Data Collection Methods	<ul style="list-style-type: none"> • Electronic Forms • Printed Forms • Information and Documents Declared by the Data Subject • Business Card • Tender Dossier • When Attending a Meeting or Event

Contact Information	
Processed Personal Data	<ul style="list-style-type: none"> • Phone number • Fax Number • E-mail address • Office Address • Office phone
Purposes of Processing Personal Data	<ul style="list-style-type: none"> • Execution of goods / services sales processes • Execution of marketing processes of product / services • Organization and Event Management • Execution / supervision of business activities
Legal Reasons for Processing Personal Data	<p>Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:</p> <ul style="list-style-type: none"> • Provided that it does not harm the fundamental rights and freedoms of the data subject, based on the legal reason that data processing is mandatory for the legitimate interests of the data controller, for the purposes of execution of marketing processes of products/services, organization and activity management, execution of goods/services sales processes, • Based on the legal reason that the data subject provided their explicit consent, for the purposes of execution/supervision of business activities.
Personal Data Collection Methods	<ul style="list-style-type: none"> • Electronic Forms • Printed Forms • Information and Documents Declared by the Data Subject • When Attending a Meeting or Event • Business Card • Tender Dossier

Personal Information	
Processed Personal Data	<ul style="list-style-type: none"> Title
Purposes of Processing Personal Data	<ul style="list-style-type: none"> Execution of goods / services sales processes Execution of marketing processes of product / services Organization and Event Management Execution / supervision of business activities
Legal Reasons for Processing Personal Data	<p>Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:</p> <ul style="list-style-type: none"> Provided that it does not harm the fundamental rights and freedoms of the data subject, based on the legal reason that data processing is mandatory for the legitimate interests of the data controller, for the purposes of execution of marketing processes of products/services, organization and activity management, execution of goods/services sales processes, Based on the legal reason that the data subject provided their explicit consent, for the purposes of execution/supervision of business activities.
Personal Data Collection Methods	<ul style="list-style-type: none"> Electronic Forms Information and Documents Declared by the Data Subject When Attending a Meeting or Event Business Card

Customer Transaction Information	
Processed Personal Data	<ul style="list-style-type: none"> Request Information Project Information Explosives Use Permit
Purposes of Processing Personal Data	<ul style="list-style-type: none"> Execution of goods / services sales processes Execution / supervision of business activities
Legal Reasons for Processing Personal Data	<p>Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:</p> <ul style="list-style-type: none"> Provided that it does not harm the fundamental rights and freedoms of the data subject, based on the legal reason that data processing is mandatory for the legitimate interests of the data controller, for the purposes of

	<p>execution of goods/ services sales processes,</p> <ul style="list-style-type: none"> • Based on the legal reason that the data subject provided their explicit consent, for the purposes of execution/supervision of business activities.
Personal Data Collection Methods	<ul style="list-style-type: none"> • Electronic Forms • Information and Documents Declared by the Data Subject

Financial Information	
Processed Personal Data	<ul style="list-style-type: none"> • Tax Board • Collateral Information • Payment Term • Risk Limit
Purposes of Processing Personal Data	<ul style="list-style-type: none"> • Execution of goods / services sales processes • Execution / supervision of business activities
Legal Reasons for Processing Personal Data	<p>Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:</p> <ul style="list-style-type: none"> • Provided that it does not harm the fundamental rights and freedoms of the data subject, based on the legal reason that data processing is mandatory for the legitimate interests of the data controller, for the purposes of execution of goods/services sales processes, • Based on the legal reason that the data subject provided their explicit consent, for the purposes of execution/supervision of business activities.
Personal Data Collection Methods	<ul style="list-style-type: none"> • Electronic Forms • Information and Documents Declared by the Data Subject

2. To Whom Your Personal Data May Be Transferred And For What Purposes?

Your Personal Data:

- **In Turkey-** may be transferred to **Suppliers (Advertising Agency and other)** for the purposes of execution of goods/ service procurement processes for the services to be procured from suppliers within the scope of service contract between us; to **Authorized Public Institutions and Organizations** for the purposes of provision of information; to **Real or Private Law Entities** (Banks and other) for the purposes of execution of finance and accounting works;

- **In Abroad;** may be transferred to **Incitec Pivot Limited** (“IPL”), of which Nitromak is a subsidiary, for the purposes of execution/ supervision of business activities, if you give your explicit consent.

Within the framework of the personal data processing conditions in the 5th and 6th articles of the PDPL, by following the rules in the 8th and 9th articles of the PDPL regarding the transfer and by taking the necessary technical and administrative measures.

The servers of several software and systems (ERP, LMS, DMS, ITSM, Fileserver, Active Directory Service and software-based loggings) used by Nitromak for business activities are located at the data center of Incitec Pivot Limited (“IPL”) of which Nitromak is a subsidiary, and Nitromak personal data processed by Nitromak through said software and systems is transferred to IPL for execution/ supervision of business activities.

3. For How Long Your Personal Data Will be Stored?

Your personal data must be stored according to the time periods set by law or related legislation as a minimum. If there is no time set by law or related legislation, then personal data must be stored for a reasonable period of time determined in connection with the purposes of processing, provided that it is limited and measured.

4. What Are Your Rights Regarding Your Personal Data as a Data Subject?

Regarding your personal data, you have the rights to:

- Learn whether your personal data is processed,
- Request information if your personal data has been processed,
- Learn the purpose of processing personal data and whether your data is used in accordance with that purpose,
- Know the third parties to whom your personal data is transferred, in Turkey or in abroad,
- Request correction of your personal data if it is incomplete or incorrectly processed,
- Request the deletion or destruction of your personal data within the framework of the conditions stipulated in the PDPL legislation,
- When you request the deletion or destruction of your personal data with the correction of incomplete or incorrect data, to request that this situation be notified to the third parties to whom we have transferred your personal data,
- Object to the emergence of a result against the person himself by analysing the processed data exclusively through automated systems,
- If you suffer damage due to unlawful processing of personal data, to request the elimination of this damage.

5. How You May Exercise Your Rights as the Data Subject?

You may submit your applications and requests regarding your personal data by completing the Data Subject Application Form on Nitromak's website (<http://www.nitromak.com/basvuru-formu>), and

- By sending it through a notary,

- With a valid identity document, Nitromak's "Via Flat Business Center Beştepeler Mah. Nergis Sokak No: 7/2 Ofis No: 52 Söğütözü Yenimahalle Ankara" by applying in person in writing,
- By sending it to Nitromak's registered electronic mail (KEP) address, nitromak@hs03.kep.tr, using a registered electronic mail (KEP) address and secure electronic signature or mobile signature.

Pursuant to the Communiqué on the Procedures and Principles of Application to the Data Controller, the following information must be included in the application of the Relevant Person:

- Name, surname, and signature if the application is written,
- For citizens of the Republic of Turkey- the Turkish id number; for foreigners- the nationality and the passport number or if any, the id number,
- Domicile or workplace address for notification,
- If available, the e-mail address, telephone, and fax number for notification,
- The subject of the request

The Data Subject must clearly and comprehensibly state their request in the application which is to be made to exercise their above-mentioned rights and includes required explanation about the right in subject. Related Information and documents must be attached to the application.

The subject of the request must be related in person to the applicant. However, if the applicant is acting on behalf of someone else, then the applicant must be specifically authorized in this regard and this authority must be documented (power of attorney). In addition, the application must contain identity and address information, and documents confirming identity must be attached to the application.

Requests made by unauthorized third parties on behalf of someone else will not be considered.

6. How Long Will It Take to Conclude your Request Regarding the Processing of Your Personal Data?

Your requests regarding your personal data are evaluated and concluded as soon as possible and within 30 days at the latest from the date they reach Nitromak. If your request is accepted or rejected by explaining the reason, our reply will be sent to the address you specified in the application, primarily by postal or e-mail, if possible, in the same manner as your request.