

CLARIFICATION TEXT REGARDING THE PROCESSING OF PERSONAL DATA FOR VISITORS

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 visitors**, 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.

During your visit to Nitromak facilities; provided that it does not harm the fundamental rights and freedoms of the data subject, your personal data may be processed on the basis of legal reasons that data processing is mandatory for the legitimate interests of the data controller, it is expressly provided for by the laws, the explicit consent of data subject, and that it is necessary for compliance with the legal obligations to which the data controller is the subject in accordance with the obligatory for the data controller to fulfill his legal obligations in accordance with the Law No 5201. on Inspection of Warfare Equipment and Industrial Organizations Producing Weapons, Ammunition and Explosives, Defence Industry Security Law No. 5202, Defence Industry Security Regulation No. 27601, Ministry of National Defence Industry Security Directive MSY 317-2 C, Regulation no. 87/12028 on the Procedures and Principles of Production, Import, Transport, Storage, Storage, Sale, Use, Disposal, Inspection of Explosive Substances Excluded from Monopoly and Hunting Equipment and other related legislation.

1. Which of your Personal Data is Processed?

ID Information	
Processed Personal Data	<ul style="list-style-type: none">• Name Surname• Turkish id number• Passport number (for foreigners)• Signature• Vehicle Plate
Purposes of Processing Personal Data	<ul style="list-style-type: none">• Execution of Information Security Processes• Keeping and Tracking Visitor Records• Providing Physical Structure Security• Execution of Activities in Compliance with the Legislation
Legal Reasons for Processing Personal Data	Your personal data is processed by Nitromak in line with the provisions specified in Article 5 of the PDPL:

	<ul style="list-style-type: none"> ● Based on the legal reason that it is mandatory for the data controller to fulfill its legal obligation, for the purposes of execution of information security processes, keeping and tracking visitor records, providing physical structure security and execution of activities in compliance with the legislation, ● 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 keeping and tracking visitor records, providing physical structure security and execution of activities in compliance with the legislation, ● Based on the legal reason that the data subject provided their explicit consent, for the purposes of execution of information security processes.
Personal Data Collection Methods	<ul style="list-style-type: none"> ● Data collected through information systems and electronic devices (data collected without any form – e.g., access logs, etc.) ● Visitor Login Form ● Record book ● Statement of Data Subject

Contact Information	
Processed Personal Data	<ul style="list-style-type: none"> ● Mobile number ● E-mail address ● Contact Number ● Business Name/Title
Purposes of Processing Personal Data	<ul style="list-style-type: none"> ● Execution of Information Security Processes ● Keeping and Tracking Visitor Records ● Providing Physical Structure Security ● Execution of Activities in Compliance with the Legislation
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"> ● Based on the legal reason that it is mandatory for the data controller to fulfill its legal obligation, for the purposes of execution of information security processes, keeping and tracking visitor records, providing physical structure security and execution of activities in compliance with the legislation, ● Provided that it does not harm the fundamental rights and freedoms of the data subject, based on the legal reason that

	<p>data processing is mandatory for the legitimate interests of the data controller, for the purposes of keeping and tracking visitor records, providing physical structure security and execution of activities in compliance with the legislation,</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 of information security processes.
Personal Data Collection Methods	<ul style="list-style-type: none"> ● Data collected through information systems and electronic devices (data collected without any form – e.g., access logs, etc.) ● Visitor Login Form ● Record book ● Statement of Data Subject

Physical Structure Security Information	
Processed Personal Data	<ul style="list-style-type: none"> ● CCTV Recordings ● Entry Exit Time Information ● Visit date ● Reason for Visit ● Deposit Item Information ● Deposit Item Delivery/Return Date and Time Information ● Electronic Device Brand/Model ● Electronic Device Delivery/Return Date and Time Information ● Weapon Serial Number ● Weapon License or Carriage Authorization No. ● Weapon Delivery/Return Date and Time Information
Purposes of Processing Personal Data	<ul style="list-style-type: none"> ● Providing Physical Structure Security ● Keeping and Tracking Visitor Records ● Ensuring security of data controller operations ● Execution of Activities in Compliance with the Legislation ● Execution of Occupational Health / Safety 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"> ● Based on the legal reason that it is mandatory for the data controller to fulfill its legal obligation, for the purposes of keeping and tracking visitor records, providing physical structure security and execution of activities in compliance with the legislation, ensuring the security of data controller operations, execution of occupational health / safety activities,

	<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 providing physical structure security and ensuring security of data controller operations, execution of occupational health / safety activities
Personal Data Collection Methods	<ul style="list-style-type: none"> ● CCTV Recordings ● Visitor Login Form ● Record book ● Statement of Data Subject

Information Security Data	
Processed Personal Data	<ul style="list-style-type: none"> ● IP Address Information ● Internet Usage Start and End Time ● MAC Address ● Destination IP Address ● Port Information
Purposes of Processing Personal Data	<ul style="list-style-type: none"> ● Execution of Activities in Compliance with the Legislation ● Execution of Information Security Processes
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"> ● Based on the legal reason that it is expressly provided for by the law, for the purposes of execution of activities in compliance with the legislation, ● Carrying out the activities in accordance with the legislation based on the legal reason that it is mandatory for the data controller to fulfill its legal obligation, ● Based on the legal reason that the data subject provided their explicit consent, for the purposes of execution of information security processes.
Personal Data Collection Method	<ul style="list-style-type: none"> ● Data collected through information systems and electronic devices (data collected without any form – e.g., access logs, etc.)

2. To Whom Your Personal Data May be Transferred and For What Purposes?

Your Personal Data:

- **In Turkey-** may be transferred to **Suppliers** (Information Security Firm, Private Security Firm, Legal Consultant and other) for the purposes of execution/audit of business activities, execution of goods/service procurement processes, follow-up and execution of legal affairs and execution of supply chain management processes within the scope of services to be provided from suppliers according to the service contract between us; to **Authorized Public Institutions and Organizations** (Ministry of Domestic Affairs, General Police Directorate, Ministry of National Defence, Ministry of Transport and other) for the purposes of providing information and execution of activities in compliance with the legislation;
- **In Abroad;** may be transferred to **Incitec Pivot Limited**¹(“IPL”), of which Nitromak is a subsidiary, for the purposes of execution of information security processes, 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,

¹ Incitec Pivot Limited (“IPL”) is a holding company located in Australia, established under Australian law, registered with the Australian Securities and Investment Commission (ASIC), and Nitromak Dnx Kimya Sanayii A.Ş. is one of the companies under the holding umbrella of IPL.

- 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 Beştepelер 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.