

**STM SAVUNMA TEKNOLOJİLERİ MÜHENDİSLİK VE TİCARET A.Ş.  
GENERAL DECLARATION OF CLARIFICATION  
ON THE PROCESSING OF PERSONAL DATA**

We, as STM Savunma Teknolojileri Mühendislik ve Ticaret A.Ş. (“**STM**” or “**Company**”), would like to provide you with information and clarification regarding our processing operations of personal data, pursuant to Article 10 of Law No. 6698 on the Protection of Personal Data (“**LPPD**”).

**1. Data Controller and Representative**

As STM, in our capacity as data controller, we may process in the manner according to the law and to honesty, record, store, classify, update, and/or, where the law allows, clarify/transfer to third parties limited to the purposes for processing your personal data, pursuant to the LPPD and in the scope of the objectives elaborated below.

**2. Purpose for Processing Your Personal Data**

Your aforementioned personal data is processed to be able conduct our work with any and all commercial operations, to be able to meet the demands of relevant individuals, to continue technical processes, to be able to provide for the commercial security of the company, and in other contexts that may be added in the future, including our Company's operational processes, business relationships, corporate communication, business development, marketing, and the ability to conduct contractual processes, in accordance with the fundamental principles envisaged in the LPPD; and your personal data is safely stored in a physical or electronic setting for an appropriate amount of time for the purpose of being processed.

All obligations envisaged in the relevant legislation, including the LPPD, will be acted in accordance with by STM. You can access more detailed information on the subject of the purposes for processing your personal data by our Company by visiting [www.stm.com.tr](http://www.stm.com.tr) and reading the STM Personal Data Protection and Privacy Policy.

**3. Transferring Your Personal Data**

Your personal data, processed in the scope of the expressed objectives, can be transferred by STM to our business partners, shareholders, affiliates/subsidiaries, authoritative public institutions and organizations, private individuals, firms for which support services are being obtained for the purpose of being able to execute our operations, and to independent audit companies within the framework of the lawful obligations and legal limitations; limited to the objectives laid out above, within the conditions and purposes for processing personal data specified in articles 8 and 9 of the LPPD, in accordance with the basic principles envisaged in the LPPD.

#### **4. Transfer of Personal Data Abroad**

Your personal data may be transferred without procuring express consent by STM only to people or institution settled in foreign countries that have sufficient protection to be determined by the Personal Data Protection Board ("Board"), after these countries have been announced, by means of the procurement of explicit consent in light of the principles laid out in article 4(2) of the LPPD or should there exist the situations envisaged in articles 5(2) and 6(3), pursuant to the rules in article 9 of the Law; and, for identified and declared countries where sufficient protection exists, on the condition of it being limited to situations where the data controllers in the relevant foreign country have undertaken sufficient protection in writing and where the permission of the Council can be procured in terms of the relevant transfer.

#### **5. Methods and Causes of Action for the Collection of Your Personal Data**

Your personal data is gathered by STM for the purposes of developing the services we present that are listed above and that are to be added in the future and to conduct any and all our commercial operations, based on the legal reasons specified above and by means of different departments and channels, primarily online channels, social media accounts, email addresses, corporate communication, business development, strategic development, marketing, and CRM (Customer Relations Management) operations in written, verbal, electronic, and other manners by automatic and non-automatic means.

In this framework, your personal data can be processed and transferred without procuring your explicit consent by means of procuring explicit consent in light of the principles envisaged in article 4(2) of the LPPD or should there exist situations envisaged in article 6(3).

#### **6. Your Rights as a Relevant Person Pursuant to Article 11 of the LPPD**

As the data subject, you can forward requests regarding your rights to the address of Mustafa Kemal Mahallesi, 2151. Cadde No:3/ A Çankaya 06530 Ankara or the email address of [privacy@stm.com.tr](mailto:privacy@stm.com.tr) by filling out and signing the Data Subject Application Form at the address of [www.stm.com.tr](http://www.stm.com.tr). STM will conclude the request, according to its quality, free of charge as soon as possible and within no later than thirty (30) days. However, should the operation require an additional expense, we will receive a fee at the rate specified by the Council. The rights you have pursuant to article 11 of the LPPD are as follows:

- a) to learn whether his personal data are processed or not,
- b) to request information if his personal data are processed,
- c) to learn the purpose of his data processing and whether this data is used for intended purposes,
- d) to know the third parties to whom his personal data is transferred at home or abroad,
- e) to request the rectification of the incomplete or inaccurate data, if any,

- f) to request the erasure or destruction of his personal data under the conditions laid down in Article 7,
- g) to request notification of the operations carried out in compliance with subparagraphs (d) and (e) to third parties to whom his personal data has been transferred,
- h) to object to the processing, exclusively by automatic means, of his personal data, which leads to an unfavourable consequence for the data subject,
- i) to request compensation for the damage arising from the unlawful processing of his personal data

## **7. Duration of Storage of Personal Data**

Through the channels mentioned in this Clarification Declaration of Clarification, the personal data that you have shared with STM will processed as long as the aforementioned, legitimate purposes remain in any case such that it abides by the periods of time mandated in all relevant legislation, primarily the LPPD.

## **8. Request the Update of Your Information**

Your personal data that we gather must be accurate and, when necessary, updated. For this reason, should there be any kind of change that occurs in your personal data, you can provide notification of this matter to the address of Mustafa Kemal Mahallesi, 2151. Cadde No:3/ A Çankaya 06530 Ankara or the email address of [privacy@stm.com.tr](mailto:privacy@stm.com.tr).

\* This Declaration of Clarification ("Declaration") was prepared on the date of 30.03.2018. Should there be any kind of change within the text of the declaration, the effective date and content will be updated.