

STM SAVUNMA TEKNOLOJİLERİ MÜHENDİSLİK VE TİCARET A.Ş.
DECLARATION OF CLARIFICATION ON THE PROCESSING OF PERSONAL DATA
FOR E-BULLETIN SUBSCRIPTION AND TRANSMISSION OF COMMERCIAL
ELECTRONIC MESSAGE

As STM Savunma Teknolojileri Mühendislik ve Ticaret A.Ş. (“**STM**” or “**Company**”), in accordance with Article 10 of the Turkish Personal Data Protection Law No. 6698 (“KVKK”), we would like to inform you about your personal data shared in relation to your subscription to the E-Bulletin, as well as your personal data processed due to our commercial electronic communication activities carried out within the scope of the Law No. 6563 on the Regulation of Electronic Commerce (“The Law No. 6563”).

Within this framework, we would like to briefly inform and enlighten you about our personal data processing activities, including:

- which of your data is collected,
- for what purposes your data is processed,
- with whom your data is shared,
- the methods of collection of your data and its legal grounds, and,
- your rights under the LPPD

1. Who Are We?

Pursuant to the LPPD, we are STM Savunma Teknolojileri Mühendislik ve Ticaret A.Ş. the Data Controller, which determines the purposes and means of processing your personal data and is responsible for the establishment and management of the data recording system, may process your personal data in accordance with the purposes set out below; in compliance with the law and the principles of good faith; and may process, record, store, classify, update, and, where permitted by the applicable legislation and/or limited to the purpose for which they are processed, disclose/transfer such data to third parties.

2. Which Data Do We Process?

Identification Data (Name-Surname), Contact Data (E-mail Address),

3. For Which Purpose Do We Process Your Personal Data?

Within the scope of all relevant legislation, especially the LPPD legislation, your personal data is processed in accordance with the basic principles stipulated in the LPPD; for purposes such as carrying out advertising / campaign / promotion processes and activities in accordance with the legislation, in order to deliver the E-Bulletin prepared by STM to you, and it is processed and stored securely in physical or electronic environment for an appropriate period of time for the purpose of process.

4. With Whom and For What Purposes Do We Transfer Your Personal Data?

Your personal data, processed in the scope of aforementioned objectives may be transferred by STM; in accordance with the fundamental principles envisaged in the LPPD, within the scope of the personal data processing conditions and purposes specified in articles 8 and 9 of

the LPPD as well as the personal data processing conditions set forth in Articles 5 and 6 of the LPPD, limited to the purposes listed under Section 3; to our business partners, to the Centralized Commercial Message Management System (“CCMMS”) for the fulfillment of our legal obligations pursuant to the Law No. 6563. and Regulation on Commercial Communication and Commercial Electronic Messages (“Regulation”) within the framework of legal obligations and statutory limitations for the purpose of carrying out our activities; to the CCMS Business Partner “Teknolog Bilgi Teknolojileri ve Sistemleri Anonim Şirketi” from which services are procured for the execution of commercial electronic communication processes.

5. By Which Methods and On Which Legal Basis Do We Process Your Personal Data?

We may process your personal data limited to the objectives laid out above, the data you share by subscription of E-Bulletin via www.stm.com.tr by automated or non-automated means, in written, verbal, electronic and other ways through different channels and based on the legal reasons stated above.

Within this framework, your personal data may be processed and transferred in light of the principles envisaged in article 4(2) and 5(2) of the LPPD, either upon obtaining your explicit consent or, in the presence of the conditions stipulated under Article 5(2) of the LPPD—namely, where it is “*explicitly provided for by law*”, where “*the data has been made public by the data subject*”, or where “*data processing is necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject*”—without obtaining explicit consent.

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

The rights you have pursuant to Article 11 of the LPPD are as follows:

- a) to learn whether your personal data are processed,
- b) to request information if your personal data have been processed,
- c) to learn the purpose of your data processing and whether this data is used for intended purposes,
- d) to know the third parties to whom your personal data is transferred domestically or abroad,
- e) to request the rectification of the incomplete or inaccurate data, if any,
- f) to request the erasure or destruction of your personal data under the conditions laid down in Article 7¹ of the LPPD,
- g) to request notification of the operations carried out in compliance with subparagraphs (d) and (e) to third parties to whom your personal data has been transferred,
- h) to object to the occurrence of a result against yourself by analyzing the processed data exclusively through automated systems,

¹ ARTICLE 7- (1) Despite being processed under the provisions of this Law and other related laws, personal data shall be erased, destroyed or anonymized by the controller, ex officio or upon demand by the data subject, upon disappearance of reasons which require the process. (2) Provisions of other laws concerning the erasure, destruction or anonymizing of personal data are reserved. (3) Procedures and principles for the erasure, destruction or anonymizing of personal data shall be laid down through a by-law

which leads to an unfavorable consequence for the data subject,
i) to request compensation for the damage in case you incur damages due to unlawful processing of your personal data

As the personal data owner, referred to as the “Data Subject, you may submit your requests regarding your rights set forth under Article 11 of the LPPD, in accordance with paragraph 1 of Article 13 of the LPPD, by filling in the Data Subject Application Form available at www.stm.com.tr in “Turkish” and signing it, and sending it in writing to the address “Mustafa Kemal Mahallesi, İsmail Karakaya Caddesi No:3/A İç Kapı No:1 Çankaya 06530 Ankara” in accordance with subparagraph 2 of Article 4 of the Communiqué on the Procedures and Principles of Application to the Data Controller; or by submitting it electronically to our Company’s registered e-mail address (stmsavunma@hs01.kep.tr) or to privacy@stm.com.tr e-mail address with signing by secure electronic signature or mobile signature. Depending on the nature of the request, STM will conclude the request free of charge as soon as possible and within thirty (30) days at the latest. However, if the transaction requires an additional cost, the fee in the tariff determined by the Board shall be charged by us.

7. Duration of Storage of Personal Data

Your Personal Data shall be processed in compliance with the processing and term of limitations regarding all relevant laws and other legal regulations to which STM is subject to, limited to the purposes specified in this Declaration of Clarification. If any amendment to the law regarding the data processing periods, the new regulation determined will be taken as basis. Pursuant to Law No. 6563 on the Regulation of Electronic Commerce and the Regulation on Commercial Communication and Commercial Electronic Messages, your consent records are retained for three (3) years from the date on which the consent expires, and other records related to commercial electronic messages are retained for three (3) years from the date of recording. Your other personal data shall be processed, in accordance with the principle of limitation to purpose, for the period required for the fulfillment of the purposes set out in this Declaration of Clarification and, in any case, for the period required in accordance with the Company’s practices and customary practices of commercial life. Upon the expiry of such periods, your personal data shall be deleted, destroyed, or anonymized.

I Declare That I Have Read And Understood The Declaration of Clarification By Ticking The Relevant Section In The E-Bulletin Subscription.