



Contractor Privacy Notice

IGDP_N7 VERSION 1.00

ELOPSIS ELECTRONIC OPTRONIC DEFENSE SYSTEMS CORPORATION

Contractor Privacy Notice

Data Controller : Elopsis Electronic Optronik Defense Systems Corporation
Address : Yıldızevler Mah. Cezayir Cad. No:16/A Çankaya/Ankara
Telephone : (+90)0 312 441 07 50
E-Mail : dpo@elopsis.net
Web Site : <https://www.elopsis.net>

Elopsis Electronic Optronik Defense Systems Corporation (hereinafter "ELOPSIS" or "will be referred to as the Company) acting as data controller processes your personal data which we receive by the company to which you work for within the context of services and goods provided by Contractor companies to ELOPSIS in accordance with the provisions of Law No. 6698 on Protection of Personal Data ("KVKK") and applicable legislation. Any reference to "we", "us", "our" and "the Company" is to the Elopsis Electronic Optronik Defense Systems Corporation. We're known as the "data controller". You can contact us at dpo@elopsis.net for more information about how we process your data, including how to exercise your rights as a data subject.

This notice describes the categories of personal information we may process, how your personal information may be processed and how your privacy is safeguarded in the course of our relationship with you. It is intended to comply with our obligations to provide you with information about the Company's processing of your personal information pursuant to Article 10 of KVKK. It does not have contractual status.

This Contractor Privacy Notice is for any individual whose personal data we process and who falls under the following categories:

- Contractors engaged to provide services e.g., sole traders, and individuals providing services via limited companies, partnerships or personal service companies
- Individuals engaged by outsourced services providers. e.g. cleaning/security/catering contractors
- Agency workers

How does the Company collect your data?

The Company collects and records your personal information from a variety of sources, including directly from you. You may provide this information directly to your Company or production/project team contact through being considered for assignments, or during our contracting, onboarding and payment processes or emails and CV's which you send to the Company in the course of your engagement on a production or project, or an unsolicited CV for potential future engagements. You may also send us updated versions of your CV from time to time ("Updated CV's").

For agency workers and individuals engaged by outsourced service providers we may receive data directly from the relevant agency or service provider. We may also obtain some

information from third parties, for example to carry out a background check (where permitted by applicable law) or if securing references as part of the process for offering assignments.

In some circumstances, your data may be collected indirectly from monitoring devices or by other means (for example, building and location access control and monitoring systems, Closed Circuit television footage, telephone logs and recordings and email and Internet access logs), if and to the extent permitted by applicable laws.

In these circumstances, the data may be collected by the Company or a third party provider of the relevant service. This type of data is generally not accessed on a routine basis but access is possible. Access may occur, for instance, in situations where the Company is investigating possible violations of Company policies such as those relating to travel and expense reimbursement, use of the telephone system and IT Resources(in accordance with Acceptable Use Policy) or contractor conduct generally, or where the data are needed for compliance or billing purposes. More frequent access to such data may occur incidental to an official email surveillance program in order to protect the Company's corporate e-mail and IT services against viruses, malware and other threats, if and to the extent permitted by applicable laws. To the extent permitted by applicable laws, the Company carries out monitoring of the Company's IT systems to protect and maintain the integrity of the Company's IT systems and infrastructure; to ensure compliance with the Company's IT policies and to locate information through searches where needed for a legitimate business purpose.

Where we ask you to provide personal information to us on a mandatory basis, we will inform you of this at the time of collection and in the event that particular information is required by the contract or statute this will be indicated. Failure to provide any mandatory information will mean that we cannot carry out certain processes. For example, if you do not provide us with your bank details, we will not be able to pay you. In some cases it may mean that we are unable to continue with your engagement as the Company will not have the personal information we believe to be necessary for the effective and efficient administration and management of our engagement with you and comply with tax and social security law.

Apart from personal information about you, you may also provide the Company with personal information of third parties, i.e., for purposes of administration and management including to contact your next-of-kin in an emergency. Before you provide any such third party personal information to the Company you must first inform these third parties of any data you intend to provide to the Company and of the processing to be carried out by the Company, as detailed in this Contractor Privacy Notice.

What information are we processing and why?

Personal information means any information describing or relating to an identifiable individual, such as name, address, age, contact details, health etc. Additional information that we process on Contractors includes:

Identity Details	
Processed personal data	Purpose for processing
<ul style="list-style-type: none"> • Name Surname • Social Security Number • TR Personal Identification Number 	To enter into / perform a contract for services with you, Conducting Audit and Ethical Activities and Training Activities, Conducting Business Activities in Compliance with Legislation, Identifying and communicating effectively with contractors , agency works and other individuals; , Recruitment and selection, Allocating and managing duties and

<ul style="list-style-type: none"> • Passport Number • Passport Photocopy • Signature • Gender • Date of Birth • Place of Birth • Marital Status • Age 	responsibilities and the business activities To which they relate, including business travel; Execution of Occupational Health and Safety Activities, Ensuring Business Continuity, Execution of Finance and Accounting Affairs, Follow-up and Execution of Legal Affairs, Execution of Logistics Activities, Execution of Goods or Service Purchase Processes, Execution of Goods / Service Production and Operation Processes, Execution of After Sales Support Services, To support administration and management and maintaining and processing general records necessary to manage the contractor relationship and operate the contract for services;
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Lawful basis for the processing of your identification details

As per Article 5 of the KVKK and relevant legislation, Company process your personal data for aforementioned purposes only if and to the extent that at least one of the following applies:

- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which the Company is subject;
- processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

Methods of Data Collection

Your identity information is collected through printed forms, documents you submit to the Company, contracts and participation in business meeting or events.

Communication Details

Processed personal data	Purpose for processing
<ul style="list-style-type: none"> • E-mail Address • business phone number • Mobile phone Number • Business Address • Business Trade Name and Title 	To make contact regarding your engagement with the Company, Conducting Audit and Ethical Activities and Training Activities, Conducting Business Activities in Compliance with Legislation, Identifying and communicating effectively with contractors , agency works and other individuals; , Recruitment and selection, Allocating and managing duties and responsibilities and the business activities To which they relate, including business travel; Execution of Occupational Health and Safety Activities, Ensuring Business Continuity, Execution of Finance and Accounting Affairs, Follow-up and Execution of Legal Affairs, Execution of Logistics Activities, Execution of Goods or Service Purchase Processes, Execution of Goods / Service Production and Operation Processes, Execution of After Sales Support Services, To support administration and management and maintaining and processing general records necessary to manage the contractor relationship and operate the contract for services;

Lawful basis for the processing of your communication details

As per Article 5 of the KVKK and relevant legislation, Company process your personal data for aforementioned purposes only if and to the extent that at least one of the following applies:

- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which the Company is subject;
- processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject..

Methods of Data Collection

Your communication details are collected through printed forms, documents you submit to the Company, contracts and participation in business meeting or events

Employee Personnel File Information

Processed personal data	Purpose for processing
<ul style="list-style-type: none"> • Social Security Institution-Statement of employment • Social Security Institution Termination of Employment Declaration • CV details Occupational position and Title details • Profession Details • Details of your rates and tax information • Results of employment history check 	<p>Conducting Audit and Ethical Activities and Training Activities, Conducting Business Activities in Compliance with Legislation, To perform the contract for services, including payment of day rates, allocating and managing duties and responsibilities and the business activities to which they relate, including business travel; Ensuring Business Continuity, Execution of Finance and Accounting Affairs, Follow-up and Execution of Legal Affairs, Execution of After Sales Support Services, To support administration and management and maintaining and processing general records necessary to manage the contractor relationship and operate the contract for services; Compliance with employment, health and safety or social security laws. For example, to avoid breaching legal duties to you, to ensure fair and lawful management of your assignment, to make reasonable accommodations or adjustments and avoid unlawful discrimination or dealing with complaints arising in this regard, To comply with lawful requests by public authorities, To enforce our legal rights and obligations, and for any purposes in connection with any legal claims made by, against or otherwise involving you; to verify the qualifications information provided by you</p>

Lawful basis for the processing of your Personnel File Information

As per Article 5 of the KVKK and relevant legislation, Company process your personal data for aforementioned purposes only if and to the extent that at least one of the following applies:

- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which the Company is subject;
- processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

Methods of Data Collection

Your Personnel File Information details are collected through printed or electronical forms, documents you submit to the Company, contracts and participation in business meeting or

events	
Details of your qualifications and any professional status	
Processed personal data	Purpose for processing
<ul style="list-style-type: none"> • Certificates • Diploma Information • Vocational Graining Information • Course Taken • Professional Competence Certificate 	Identifying and communicating effectively with contractors , agency works and other individuals; , Recruitment and selection, Allocating and managing duties and responsibilities and the business activities to which they relate, including business travel; Execution of Occupational Health and Safety Activities, Ensuring Business Continuity, Execution of Finance and Accounting Affairs, Follow-up and Execution of Legal Affairs, Execution of Logistics Activities, Execution of Goods or Service Purchase Processes, to support administration and management and maintaining and processing general records necessary to manage the contractor relationship and operate the contract for services; Compliance with employment, health and safety or social security laws, to comply with lawful requests by public authorities, to enforce our legal rights and obligations, and for any purposes in connection with any legal claims made by, against or otherwise involving you, to ensure you are qualified for the role that you perform. This data may be shared with clients to satisfy them that you are qualified to work for their project and with regulatory bodies
Lawful basis for the processing of your Details of your qualifications and any professional status	
As per Article 5 of the KVKK and relevant legislation, Company process your personal data for aforementioned purposes only if and to the extent that at least one of the following applies: <ul style="list-style-type: none"> • processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; • processing is necessary for compliance with a legal obligation to which the Company is subject; • processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject. 	
Methods of Data Collection	
Your details of your qualifications and any professional status are collected through printed or electronical forms, documents you submit to the Company, contracts and participation in business meeting or events	
Family Members Data	
Processed personal data	Purpose for processing
<ul style="list-style-type: none"> • Dependents including children 	Conducting Finance and Accounting Affairs, Execution of Activities in Compliance with Legislation, Human Resources Planning Processes, Informing Authorized Persons, Institutions and Organizations. To contact an emergency contact in case of emergency (e.g. your spouse or next of kin.)
Lawful basis for the processing of your Family Members Data	
As per Article 5 of the KVKK and relevant legislation, Company process your personal data for aforementioned purposes only if and to the extent that at least one of the following applies:	

- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which the Company is subject;
- processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

Methods of Data Collection

Your Family Members details are collected through printed or electronic forms, documents you submit to the Company, contracts and participation in business meeting or events

Legal Basis for the Collection and Processing of Special Categories of Personal Data

Special categories of personal data means personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions and security measures, and the biometric and genetic data are deemed to be personal data of special nature.(Article 6 of the KVKK)

Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation is subject to a higher level of scrutiny.

Company may only process special categories of personal data only if the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Turkish law provide that the prohibition of processing of sensitive data may not be lifted by the data subject and if one of the following applies:

- a. processing relates to personal data which are manifestly made public by the data subject;
- b. processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the Company or of the data subject in the field of employment and social security and social protection law in so far as it is authorized by Turkish legislation or a collective agreement pursuant to Turkish Labor law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;
- c. processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
- d. processing is necessary for the establishment, exercise or defense of legal claims or whenever courts are acting in their judicial capacity;
- e. processing is necessary for reasons of substantial public interest, on the basis of Turkish legislation which shall be proportionate to the aim pursued, respect the essence of the

right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;

f. processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Turkish law or pursuant to contract with a health professional and subject to professional secrecy;

g. processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats (e.g. epidemic and pandemic) to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Turkish law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy.

Special category data	
Processed personal data	Purpose for processing
<ul style="list-style-type: none"> • Medical Certificate • Diagnosis Data • Chest Radiography • Disability Status Information • Blood Type Data • Tobacco Usage Data • Alcohol Usage Data • Suitable for hazardous working conditions certificate • Suitable for High-Altitude Work Stations Certificate • Electrocardiogram • Audio Test • Blood Analysis • Pulmonary Function Test • Suitable for heavy and dangerous Works in High Altitude Report • Hearing Test • Blood Tests • Criminal records 	<p>Conducting Emergency Response Planning and Implementation and Training Activities, Conducting Business Activities in Compliance with Legislation, Execution of Occupational Health and Safety Activities, Ensuring Business Continuity Execution of Goods / Service Production and Operation Processes, Execution of Contract Processes, Communication with health and social security agencies, The collection of statistical data subject to local laws, or where required to record such characteristics to comply with equality and diversity requirements of applicable local legislation or to keep the Company's commitment to equal opportunity under review, Compliance with employment, health and safety or social security laws. For example, to avoid breaching legal duties to you, to ensure fair and lawful management of your assignment, to make reasonable accommodations or adjustments and avoid unlawful discrimination or dealing with complaints arising in this regard, Management and investigation of any complaint under the relevant Company's internal policies where such characteristics or information are relevant to the particular complaint, in order to comply with employment law obligations.</p> <p>Criminal records are processed for the following reasons(if necessary): to perform the contract for services; to comply with our legal obligations; for reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)</p>

information	
Lawful basis for the processing of your Special category data	
<p>This processing is necessary for (i) the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws and (ii) the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained. To the extent that this data is managed by our occupational health advisers or third-party benefit providers, processing is necessary for the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws. In particular employment laws relating to the effective management of complaints, anti-discrimination laws and our duty of care to contractors, agency workers and other individuals providing services</p>	
Methods of Data Collection	
<p>Your special category data is collected through health reports, printed and electronic forms and documents declared by you.</p>	

To Whom and For What Purposes We Share Your Personal Data?

Your personal data may be shared with following parties, in accordance with the KVKK and applicable legislation;

- In accordance with the legal regulations and the legislation we are subject to, your data may be shared with third parties who are legally authorized to access your information, especially the Social Security Institution. In addition, your personal data will be shared with authorized public servants or public institutions and organizations in case of a court decision or administrative orders.
- Inside of the Company, aforementioned information is shared with relevant managers, HR personnel, legal advisors and with consultants we may engage

Is Your Personal Data Transferred Abroad?

- Your personal data is not transferred to third parties established outside of the country.

How Long Is Your Personal Data Stored?

- Your personal data is stored for legal periods within the scope of the processing purpose.

After the specified period, your data is deleted, destroyed or anonymized without any request.

What are my data subject rights and how can I use them?

As a data subject you have lots of control over the information that we hold on you, these rights and how to use them are explained below.

Pursuant to Article 11 of the Law No. 6698, you have the following statutory rights that can be exercised at any time:

- (a) Right to complain to supervisory authority

- (b) Right of access
- (c) Right to rectification
- (d) Right to be forgotten
- (e) Right to restrict processing
- (f) Right to data portability
- (g) Right to object and automated decision making/profiling (Company does not use any automatic profiling methods)
- (h) Right to request compensation for the damage arising from the unlawful processing of personal data.

If the application is declined, the response is found unsatisfactory or the response is not given in due time, the data subject may lodge a complaint with the Board within thirty days of receipt of the response of the Company, or within sixty days as of the application date, in any case.

You can fill the Data Subject Application Form whose link can be found in our web site in order to exercise their rights in respect of their personal data. Applications must be send with documents that establish the identity of the data subject using one of the following modalities:

- By filling the aforementioned form and delivering the wet signed copy by hand, via notary public or by registered mail to the following address “Yıldızevler Mah. Cezayir Cad. No:16/A Çankaya/Ankara”,
- By filling the aforementioned form and attaching a secure signature in accordance with the provisions of Law No 5070 on Electronic Signatures and e-mailing to “dpo@elopsis.net”,

The company reserves the right to request information from the applicant in order to verify the identity of the data subject and direct questions to data subject in order to clarify the matters specified in the application.

Pursuant to the Communiqué on Application Procedures for data subject access requests, you must provide the Company following information in your application: name, surname, signature if application is in writing, national identification number, (passport number if you do not have Turkish nationality), place of residence or workplace address for notification, if any, e-mail address to be used for correspondence, telephone number, fax number(if available) and information to enable us to locate the personal data that you request.

You must include specific details of the data you wish to see in your request as this will enable a more efficient response from the Company. We may need to contact you for further details on your request if insufficient information is contained in the original request.

Requests may be made by you personally or by a third party e.g. a solicitor acting on your behalf. We will request evidence that the third party is entitled to act on your behalf if this is not provided at the same time as the request is made.

The Company will comply with your request without delay and at the latest within one month unless one of the following applies:

- In some cases, we will be unable to supply certain pieces of information that you have requested. This may be because it is subject to legal privilege or relates to management planning. Where this is the case, we will inform you that your request cannot be complied with and an explanation of the reason will be provided
- We require extra time because the requests are complex or numerous. In these circumstances, the Company will write to you within one month of receipt of your request to explain why an extension is required. Where an extension is required, information will be provided within three months of the request.

Before supplying the data (where appropriate) we may contact you asking for proof of identity. You must produce this evidence for your request to be complied with.

Your request will normally be complied with free of charge. However, we may charge a reasonable fee if the request is manifestly unfounded or excessive, or if it is repetitive. In addition, we may charge a reasonable fee if you request further copies of the same information. The fee charged will be based on the administrative cost of providing the information requested.

We may refuse to comply with a subject access request if it is manifestly unfounded or excessive, or if it is repetitive. In these circumstances, we will write to you without undue delay and at the latest within one month of receipt to explain why we are unable to comply.

