

Privacy Notice

Promar Tarım ve Tekstil Ürünleri Pazarlama A.Ş. olarak (“**Promar**” / “**Company**”); occasionally stores and lawfully processes your data considered as “personal data” within the scope of the Law on Protection of Personal Data No: 6698 (the “LPPD”) when you visit our website, through any and all verbal, written and electronic means. As a result, we would like to inform you, in accordance with the LPPD and relevant regulations, regarding how and for which purposes personal data is processed by our Company bearing the title “data controller” in accordance with the LPPD, and the technical and administrative measures taken in order to protect your personal data.

Principles Relating to Processing of Personal Data

Personal data is processed in the light of the principles below:

- a) Lawfulness, fairness and transparency.
- b) Accuracy and where necessary, keeping up to date.
- c) Processing for specified, explicit and legitimate purposes.
- d) Adequacy, relevancy and limitation to what is necessary in relation to the purposes for which they are processed.
- e) Storing only as long provisioned by relevant regulations or necessary for the purposes for which they are processed.

Obligation to inform

Article 10 of the LPPD imposes an obligation on the data controllers to inform those whose personal data are processed whilst obtaining their consent in this regard and requires the data subjects to be informed. The Company, bearing the title ‘data controller’ in accordance with the relevant provision must inform the data subjects regarding:

- a) the identity of the data controller and if applicable, their representative,
- b) the purposes for which the personal data are processed,
- c) to whom and for what purposes the processed personal data may be transferred,
- d) the methods and the legal grounds for the collection of personal data,
- e) the rights which the data subject may exercise against the data controller in accordance with Article 11 of the LPPD.

As Promar, we are informing all our visitors regarding the processing and protection of personal data in accordance with Article 10 of the LPPD with this Information Notice.

Identity of the Data Controller

Article 3/1(1) of the LPPD defines data controller as “*Real or legal persons who determine the purposes and means of processing personal data, who are responsible for the establishment and management of the data registry system*” and within this framework, Promar bears the title of data controller.

Promar Tarım ve Tekstil Ürünleri Pazarlama A.Ş.

Ergene OSB, Vakıflar OSB Mahallesi 18nci Sokak No:7/1 59930 Ergene-Tekirdağ

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Processing of Personal Data and its Purposes

Within the scope of your relationship with the Company, the following personal data are processed;

- i. **Identity Information:** Name, Surname
- ii. **Contact Information:** Phone number, e-mail and address

- iii. **Information Security:** Website login-exit information, IP address information
- iv. **Other data:** Data we obtain through the cookies, and your message regarding your requests and suggestions

As Promar, your personal data is only processed in the presence of your explicit consent or in the presence of conditions of lawfulness for processing stated below.

- a) Explicitly required by law.
- b) Processing is necessary in order to protect the vital interests of the data subject or of another natural person who cannot give consent because of material impossibilities or whose consent is not legally valid.
- c) Processing the personal data of the contract parties is necessary, as long as it is directly relevant to the establishment or performance of a contract
- d) Processing is necessary for compliance with a legal obligation to which the controller is subject.
- e) Personal data made public by the data subject him/herself.
- f) Processing is necessary for the establishment, execution or protection of a right.
- g) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

In accordance with the abovementioned principles; your personal data is processed;

- (i) to fulfill our legal obligations under the relevant legislations and agreements,
- (ii) to carry out our commercial activities (*including commercial activities and marketing activities carried out through our e-commerce website*),
- (iii) to ensure that our Company's units carry out and complete the necessary tasks,
- (iv) to protect the lawful legitimate interests of real and legal persons with whom we have business relationships,
- (v) to determine our Company's commercial and business strategies,
- (vi) to resolve the demands and complaints received from you and to increase the data safety in accordance with our obligations within the scope of the LPPD.

To Whom and For What Purposes the Personal Data may be Transferred

Your personal data processed by the Company in accordance with the LPPD principles and provisions; may only be transferred for the above mentioned purposes and along with the necessary confidentiality agreements; to company's authorized persons, our shareholders, legally authorized public institutions and real persons, within the scope of the conditions and purposes regarding the processing of personal data stipulated in Articles 8 and 9 of the LPPD.

As per Article 8 of the LPPD, the personal data may be transferred based on the express consent of the data subject or another condition stipulated in the above article with the heading '*Processing of Personal Data and its Purposes*' in the absence of express consent.

As per Article 9 of the LPPD, for the personal data to be transferred abroad, adequate protection is needed in the country which the data will be transferred to in addition to the conditions stated above. The countries where there is adequate protection shall be determined by the Personal Data Protection Board.

Methods and Legal Grounds for the Collection of Personal Data

Your personal data, as mentioned above, are collected and processed when you visit our website or through any and all verbal, written and electronic means and based on various legal grounds. Your personal data collected through these methods and on these legal grounds may be processed and transferred for the purposes described in this Information Notice, primarily to fulfill our Company's obligations correctly and in full arising from legislation and agreements and to fulfill the conditions for the processing of personal data as defined in Articles 5 and 6 of the LPPD and.

Rights of the Data Subject

Article 11 of the LPPD issues some rights for each real person whose personal data is processed and requires the data controllers to inform the data subjects on such rights under the obligation of inform.

These rights are comprised of;

- the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information; the purposes of the processing and whether the personal data is used in line with such purposes, the recipients to whom the personal data have been or will be disclosed both domestically and in abroad,
- the right to request from the controller rectification of personal data if the personal data have been processed in an incomplete and wrong manner,
- the right to request the deletion or destruction of personal data if the grounds permitting the processing of personal data do no longer exist within the scope of Article 7 of the LPPD,
- the right to request the notification of the third parties whom the personal data are transferred to regarding the rectification if the personal data have been processed in an incomplete or wrong manner or the deletion or destruction of personal data in accordance with Article 7 of the LPPD,
- the right to object to any adverse result that occurs exclusively from analyzing the processed personal data via automatic systems and right to claim compensation if any damage is incurred due to unlawful processing of personal data.

How Do We Protect?

The protection of your personal data collected and processed by Promar is provided through preventing unauthorized persons to access the data and by taking all necessary technical and administrative measures in order to make sure our clients and potential clients do not suffer from any violation, by ensuring the use of softwares by our Company in our operations are up to standards, by taking due care in choosing the third parties which we work with, by training our employees in this regard and by ensuring the compliance with the data protection policy within the company.

Application and Right to Obtain Information

In case you wish to exercise one of the rights explained above granted under Article 11 of the LPPD, you may apply to our company. This application should be made in writing or through other methods determined by the Personal Data Protection Board. We have prepared an application form for your convenience which you may find by clicking the link below.

Please hand in the application form which you have filled by;

- Coming to the Company's address **Ergene OSB, Vakıflar OSB Mahallesi 18nci Sokak No:7/1 59930 Ergene-Tekirdağ** in person (applicant should fill the application form personally and present his/her identity card),
- Sending to the Company's address **Ergene OSB, Vakıflar OSB Mahallesi 18nci Sokak No:7/1 59930 Ergene-Tekirdağ** via public notary or certified mail,

- Sending an e-mail to the Company's registered e-mail address info@promartekstil.com or promartarimtekstil@hs03.kep.tr with secure electronic signature, mobile signature or by using the registered e-mail address which has already been notified by the data subject and recorded in the Company system.

Your applications delivered to our Company through the abovementioned methods in accordance with Article 13 sub-section 2 of the LPPD, shall be answered within 30 (thirty) days upon receipt by our Company. Our reply shall be sent either in writing or through electronic means. We would like to state that, in case our reply comprises more than ten pages, a transaction fee of 1 (one) Turkish Lira may be requested per page over ten pages under LPPD.

[Application Form](#)