

## CLARIFICATION MEMO ON PERSONAL DATA PROTECTION

This clarification memo (the Clarification Memo) provides information regarding the scope of the processing of your personal data by Marlines Crew Management Denizcilik ve Logistik Hizmetleri San.Tic.Ltd.Şti (the Company) in the capacity of the data controller as per the Law No. 6698 on the Protection of Personal Data (the LPPD).

### 1. Personal Data Processing

As per article 3 of the LPPD, personal data processing means all kinds of processes conducted on personal data such as obtaining, recording, storing, preserving, modifying, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data through wholly or partially automatic means, or through non-automatic means which should part of a recording system.

### 2. Purposes of Personal Data Processing

Your personal data collected by our company are processed as follows under the conditions and for the purposes specified in the relevant articles of the LPPD;

- The processing of all kinds of your personal data or personal data of special nature included in the CV or application form that you have physically or electronically shared with us and/or related to your application, and where necessary, the transfer of the same to our group companies,
- The processing of the information which may be requested from you during your application due to the nature of the job position, and the transfer of the same to our group companies and/or entities in Turkey or abroad,
- The processing of the reference information you have provided us during your application, the transfer of the same to our group companies, and where necessary, contact with such references in any way where necessary;
- The processing of the personal data and/or personal data of special nature which you have shared with us as per the internal policies and especially the Human Resources policy of our company, and where necessary, the transfer of the same to our group companies.

The applicant/the candidate expressly consents that, in case of non-acceptance of the job application, the above-mentioned personal data and personal data of special nature provided during the job application shall be kept in the Company, group companies and all entities and systems where the data are processed and/or to which the data are transferred within the scope of the Human Resources policy and in compliance with the provisions of the LPPD.

### 3. Persons to Whom Your Processed Personal Data Will Be Transferred, and the Purpose of Transfer

In case you are recruited, your personal data collected by our Company may be transferred for the above-specified purposes to the executives, shareholders, parent companies and subsidiaries of our Company, public authorities and natural persons authorized by law, institutions and organizations to which we should transfer information as per international conventions and third persons in and out

of Turkey, including but not limited to captains, agents, management companies, consulates, visa offices, operators, charterers, port authorities, customs authorities, outsourcing companies, hosting service providers, law offices for reasons specified hereinabove.

#### 4. The Method and The Legal Ground of Collecting Personal Data

Your personal data are collected and stored by our Company for the legal reasons specified in item 2 above in a physical and/or electronic media during the term of recruitment, including the job application, and the term of the employment agreement and until the expiry of the legal retention period following the termination or expiry of the employment agreement. Your personal data, which are collected and stored for these legal reasons, can also be processed and transferred for the purposes specified in this Clarification Memo and in item 2 of the Express Consent Statement within the scope of the conditions and purposes of processing personal data as specified in Articles 5 and 6 of the LPPD.

Furthermore, working and/or living areas of our Company or vessels are monitored by means of cameras and also ambient sound is recorded for the purposes of security. Our Company can also obtain personal data due to activities of monitoring with security cameras and sound recording in the buildings and facilities of our Company for the purposes of security. These activities are performed for purposes such as enhancing the quality of services offered, maintaining reliability, ensuring security of the Company, employees and other persons and protecting the interests of customers regarding the service they receive, while the regulations under the LPPD are complied with. Video monitoring systems are used as required and in an efficient manner for the achievement of these purposes. The records which are taken and stored digitally and live camera images and sound records can be accessed by persons authorized to access only for security purposes. The limited number of persons having access to such records declare by means of a confidentiality undertaking that they will protect the privacy of the data they access to. Data collected through video and sound recording systems are stored for a period as necessitated by the purpose of recording. Our company takes the necessary technical and administrative measures to ensure security of the personal data collected as a result of this activity in compliance with Article 12 of the LPPD.

#### 5. Personal Data Processed in Line with Your Express Consent, and Purposes of Processing

Our company shall be entitled to process your personal data for the below-specified purposes within the scope of the express consent which you give by confirming this Clarification Memo and Express Consent Statement.

- Your health data that you have shared with our Company may be processed during your job application, during the term of your employment agreement and until the expiry of the legal retention period following the termination or expiry of your employment agreement, for the purposes of keeping the records stipulated by laws and granting you various fringe benefits and/or interests within the scope of your employment agreement, if any.
- Your personal data of special nature that you have shared with our Company and the information regarding memberships with associations, foundations and trade unions (including memberships to civil society organizations) and convictions and security measures may be processed by our company during your job application, during the term of your employment agreement and

until the expiry of the legal retention period following the termination or expiry of your employment agreement, for the purposes of keeping the records stipulated by laws and the performance of inspection activities. Such data of yours may be shared with the relevant group companies within the scope of your CV in case there is a chance that you can be evaluated for vacant positions in our Company's parent companies and subsidiaries.

#### 6. Rights of the Personal Data Owner Specified in Article 11 of the LPPD

If you, as personal data owners, convey your demands regarding your rights to our Company, our Company will conclude the demand free of charge within 30 (thirty) days at the latest according to the nature of your demand. In this extent, personal data owners have the right to:

- obtain information on whether their personal data has been processed,
- if processed, request information on such processing,
- obtain information on the purpose of processing personal data and whether the processed data is used for this purpose,
- be informed of the third persons to whom the personal data is transferred within and out of the country,
- if the personal data is processed incompletely or incorrectly, request correction thereof and, in this extent, request notification of the same to third persons to whom the personal data have been transferred,
- request deletion or disposal of the personal data and, in this extent, request notification of such deletion or disposal to third persons to whom the personal data have been transferred, in case the causes for processing disappear, even though the personal data have been processed in compliance with the LPPD and other relevant laws,
- object to any adverse result arising as a consequence of analysis of processed data solely by means of automatic systems,
- request compensation of damages arising out of unlawful processing of personal data.