

Sarbak Metal Industry and Trade Inc.

Customer Privacy Policy

Sarbak Metal Industry and Trade Inc., has established the "Information Security Management System (ISMS)" in order to secure and preserve the security of information assets.

Due to the importance of our company to the confidentiality of the information provided by our customers for preparing proposals, drafting contracts or communicating with any customer, In accordance with ISO 27001: 2013 (BS 7799) Information Security Management System Standard; the Company has established a Customer Privacy Policy that will protect the confidentiality, security and integrity of the customer information, including the principles of receiving, using, transferring, recording and protecting the necessary suppliers and public institutions for their business performance.

The Information Security Management System will be continuously and systematically assessed and developed by our Company.

All legal regulations and contracts related to information security will be observed. Information security risks of our company are defined according to "Risk Management Process"; This policy will be systematically monitored.

The Customer Privacy Policy will be implemented in the most effective manner; we will take care to protect all kinds of information with high security and confidentiality measures in accordance with all relevant legal regulations and contracts and we will undertake the necessary sanctions in case of any security violation.

Customers may not use the information and documents shared by **Sarbak Metal Industry and Trade Inc.** in writing or verbally contrary to the confidentiality provisions in the contracts.

Unless otherwise stated in the contractual texts with the by customer, there must be a binding article for information security related parties.

All information provided, including price, payment terms, supplier name, model, material quality, material unit prices, quantities and term dates of selected item and technology, which are shared by us in the course of bid or contract creation, are confidential information and may be any real or legal entity, soever should not be shared with.

Sarbak Metal Industry and Trade Inc.

1. GENERAL

- In order to effectively manage the information security risks in **Sarbak Metal**, the activities and the risks for are identified risks are assessed and prioritized and managed.
- Technological infrastructure is develop and precautions are taken in order to ensure the security of information assets and regular checks, tests and monitoring are carried out.
- In order to ensure that our customers' personal information is safe, our privacy and safety guidelines are communicated to **Sarbak Metal** employees, employees are informed and trained about this, and privacy measures are fully implemented within the company.
- Independent review of the eligibility, adequacy and effectiveness of the Customer Privacy Policy is provided. The results of independent review are reported and related records are kept. **Sarbak Metal** may update the Customer Privacy Policy at various times. In the event of a change in our policies, a notice will be posted on our website along with the updated Customer Privacy Policy.

2. Managing Customer Information

- **Customer Personal Information**
 1. The personal information requested from **Sarbak Metal** customers is protected by the company software programs and / or the QDMS system
 2. Sarbak Metal's goal is to keep customer information accurate, complete and up to date.
- **Customer Personal Data Protection**
 1. **Sarbak Metal** is obliged to keep customer information in a safe environment in accordance with the legislation. Customer personal information by, laws and regulations the Republic of Turkey maintained properly. The applicable laws and regulations are in compliance with the data privacy policy for storing personal information, setting, processing and sharing of retention times. Important records of **Sarbak Metal** are protected against loss and deterioration.
 2. **Sarbak Metal** sets and implements security requirements in the direction of legal regulations. In order to protect the confidentiality of our customers' personal information, our Company has established a strong infrastructure; system and internet infrastructure were keep at the most reliable level and necessary precautions were received.

- **Using Customer Personal Information**

1. We can use personal information for purposes such as audit / inspection, data analysis that can be applied to improve customer service
2. Sarbak Sarbak Metal has assure that personal information belonging to customers will not be used except for the purpose. Sarbak Metal will ensure that these companies comply with the privacy standards and conditions of Sarbak Metal if they are working with different organizations to get support services.
3. You do not have to share your personal information.

- **Disclosure to Third Parties**

1. Statutory requirements may be required for requests from the courts, from official or administrative agencies, or from the disclosure of Customer personal information for national security, network security, law enforcement or other public matters. In such cases, our Company is obliged to give this information to the requesting Institutions.
2. Any electronic that interferes with or prevents the operation of **Sarbak Metal's** IT hardware / software systems from a regulatory agency subject to Sarbak Metal or other official authorities (legislative, executive organs) or a criminal proclamation against a customer or an official investigation request tampering or attack, or for other reasons, **Sarbak Metal** is obliged to inform the official authorities of the information.
3. **Sarbak Metal**, may engage in business associations with legal authorities and other relevant institutions for any fraud or fraud or any investigation or network security violation and may, if deemed necessary by law or in fulfillment of the request of the judicial authorities, the right to disclose.
4. We may also disclose your rights if we decide that it is reasonably necessary to enforce our terms or conditions or to protect our transactions or our users.
5. Addition, we may transfer any personal information we collect in the event of restructuring, merger or sale to the relevant third party.

- **Access to Customer Personal Information**

Sarbak Metal takes precautions to prevent access to personal information of customers. Proposals to process and store customer personal information and requests that are malicious, put the privacy of others in jeopardy, are highly unavailable harmful or do not require access to local legislation are rejected.

3. **COMPANY WEB SITE MANAGEMENT**

- Our Web Site is the platform on which we announce our general Company information; it is for visual purpose. All information in **Sarbak Metal** web site is only for presentation and information purposes.
- The user can not in any way assume that the information on the web site is incomplete or than judgement inaccurate or that the information is in error. When the user intends to perform an operation with reference to the information, the user accepts that the final and reliable information is obliged to supply **Sarbak Metal** and acknowledges that **Sarbak Metal** has no responsibility for the fact that the information posted on the website is not updated.
- All the documents and information, materials and their arrangement on the website of **Sarbak Metal** are the possession of **Sarbak Metal**. All copyrights, registered trademarks, patents, intellectual and other proprietary rights of the information and materials other than those belonging to third parties included in our Web Site are reserved by our Company. You may not modify, copy, reproduce, publish, upload, post, transmit or distribute any other material on this site, including code and software. Independently of the above, you can get the printouts of the site's pages for your personal use.
- In order to ensure that the **Sarbak Metal** web site is free of viruses and similar software, the user is obliged to supply his own virus protection system and to provide the necessary protection in order to ensure the ultimate security, together with the precautions taken. In this context, the user acknowledges that he / she is responsible for any errors that may arise in his / her software and operating systems and the direct or indirect consequences thereof due to the entry into the **Sarbak Metal** website.
- **Sarbak Metal** reserves the right, at its own discretion, to change the content of the site at any time, to change or terminate any service provided to the user, and to delete user information and data stored on the **Sarbak Metal** web site. **Sarbak Metal** has taken all necessary precautions to ensure that the website contains up-to-date and accurate information, and there is no guarantee that any errors or omissions in the site may arise.
- We may link to other Web sites on our website that are not operated by our Company. If you visit any of these Websites, you should review on the privacy and other policies of that site. **Sarbak Metal** is not responsible for the policies and practices of other companies.
- Information on the structure of the Internet can be circulated on the Internet without adequate security measures and can be retrieved and used by unauthorized persons. No technological system is completely safe, "tampering" or "hacker-protected". Sarbak Metal takes precautions (as software and hardware) to prevent and minimize risks related to unauthorized access, misuse or mis-modification of your personal

information. Despite this, Sarbak Metal is not responsible for the harm. The user must take all necessary safety precautions.

- In some cases, your personal information may be collected. As an example of this type of information, the type of internet web browser you are using, your operating system, the site you are linking to, or the name of the site you are advertising can given.
- From time to time, information from your computer can be inserted to help you identify. This information is commonly known as a "cookie". This information, showing how and when our Visitors use this Site, can help us improve our Site. Cookie use is an industry standard and many websites use them. Your cookies are saved on your computer. If you want to not get cookies or want to know when they are placed, you can set your web browser to do this if your web browser has this feature.

4. PRIVACY AGREEMENTS AND PERSONNEL CONTRACTS

- Every **Sarbak Metal** personnel is responsible for protecting the confidentiality of information "F37-1 Personnel Disclosure Form".
- A separate "**Confidentiality Agreement**" is signed before the start of work with the suppliers or includes the confidentiality conditions for the service / purchase contracts made. According to the content and scope of the service / product received from the supplier who continuously and / or temporarily serving to Sarbak Metal, appropriate security issues are added to the confidentiality agreement or service / purchase contract by foreseeing the risks that **Sarbak Metal** will face. Such confidentiality provisions reflect the requirements for securing the information, and include explanations of the information to be protected and legal sanctions for violations of the confidentiality of such information.

5. CUSTOMER COMMUNICATION ADDRESS

- If you have any questions or comments regarding our Customer Privacy Policy or our services, please fill out the Contact Form on the **SARBAK METAL** website or contact our Call Center at 0 (216) 414 45 35.