

GENERAL DATA PROTECTION STATEMENT

As **CATONI DENİZ İŞLERİ ANONİM ŞİRKETİ** (TIN: 2030019292) ("**Catoni**" or "**Company**") located at "Ömer Avni Mah. İnönü Caddesi Devres Han No: 50/3 Gümüşsuyu, 34427 Beyoğlu/İSTANBUL" we pay the utmost attention to the security of your personal data. With this awareness, we give a particular importance to process and preserve the personal data of the natural people whom we interact in accordance with the Law no. 6698 ("**PDPL**" or "**the Law**"), secondary legislations (regulation, declaration etc.) and binding resolutions of Personal Data Protection Committee.

As a result of our sense of responsibility, we, as the "**Data Controller**" process your personal data considering legal limitations and purposes mentioned below; by providing all necessary technical and administrative measures to ensure the appropriate level of security, to prevent unlawful processing of personal data and unlawful access to personal data and to ensure the protection of personal data.

This Data Protection Statement aims to announce the personal data of the related persons/data owners with whom Catoni has contacted while performing the main area of activity on the website in **full compliance with the principle of transparency**, and within this text, the Data Protection Statement is made regarding the personal data processing activities within the scope of the Company's main activity and business operations.

1. Identity of the Data Controller

Catoni Deniz İşleri A.Ş. is a well-established company founded in Turkey in 1846. Initially operating in the maritime and logistics sectors, the company has evolved over time to offer its domestic and international clients a wide range of services, including trade, maritime transportation, logistics, and hydrocarbon exploration support.

With decades of experience, strong ethical values, and a solid management approach, Catoni is a trusted business partner in regional trade, providing comprehensive solutions in logistics, shipping, and integrated services.

2. Purposes of Personal Data Processing

Your personal data shall be collected and processed by the Company within the limits specified in the Law, in a limited and measured manner in accordance with the law, in good faith and always related to the following purposes of;

- Carrying out the necessary activities by Company's business departments to conduct commercial operations in compliance with legislation and Company policies,
- Determining, planning and performing Company's short, medium and long-term business policies,
- Managing customer relations, corporate communications and data security processes,
- Ensuring commercial and legal security of legal and real people who are in a business relation with the Company,
- Execution of service sales processes and after-sales support services,
- Carrying out business operations and ensuring business continuity,
- Conducting business and business activities and execution of services production & operation processes,
- Ensuring the security of data controller's operations by risk management.

3. Personal Data Collection Methods and Cause of Actions

Your personal data is processed by the Company directly from the information transmitted by you verbally, in writing or electronically, through the website and similar applications and software used within the scope of the Company's activities; by fully or partially automated or non-automated means, provided that it is part of any data recording system.

In this regard, general personal data classified below are processed based on the legal reasons listed in Article 5/2 of the Law.

While creating the classification below, both the execution of the Company's business processes, and the website activities have been taken into consideration and the necessary Data Protection Statements and/or consent notifications regarding each process and operation of the Company are notified to the relevant groups of people in the form of a layered Data Protection Statements or separately through various means.

	Category	Type	Cause of Action for Processing
1.	Identification	Name, surname, birth date and place, Turkish ID number and Signature, license plate	Processed for the following cause of actions stated in Article 5/2 of the Law; a) if it is expressly provided for by the laws, c) if the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract, ç) if it is necessary for compliance with a legal obligation to which the data controller is subject, d) if the personal data have been made public by the data subject himself/herself
2.	Contact Information	Address, e-mail, telephone number.	
3.	Customer Services	Invoice, promissory note, cheque details, order and request information	Processed for the following cause of actions stated in Article 5/2 of the Law; a) if it is expressly provided for by the laws, c) if the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract, ç) if it is necessary for compliance with a legal obligation to which the data controller is subject.
4.	Transaction Safety	MAC address information, website login-exit information	Processed for the following cause of actions stated in Article 5/2/ of the Law; if the processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.
5.	Risk Management	Data processed to manage commercial, technical, and administrative risks	
6.	Finance	Balance sheet data, financial performance, credit and risk data, asset information, credit payment details, IBAN and card information	Processed for the following cause of actions stated in Article 5/2 of the Law; a) if it is expressly provided for by the laws, c) if the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract, ç) if it is necessary for compliance with a legal obligation to which the data controller is subject.

In line with your demand, the purpose of processing each personal data category and data type will be detailed and communicated to you through the personal data inventory kept within the Company. All data protection statements specific to the website processes can be accessed under the PDPL heading on our website.

4. Transfer of Personal Data and Purposes of the Transfer

In order to fulfill the above-mentioned purposes and to ensure the uninterrupted execution of the Company's commercial operations and business processes, your personal data may be

transferred to the specified below, by taking all necessary technical and administrative measures for data security; in accordance with the cause of action of your explicit consent in **Article 8/1** if deemed necessary and in compliance with the cause of actions specified in **Article 8/2/a** of the Law, which indicates processing of your personal data if it is expressly provided for by the laws, if it is necessary for compliance with a legal obligation to which the data controller is subject, if data processing is necessary for the establishment, exercise or protection of any right and for legitimate interests of data controller without violating fundamental rights and freedoms of data subject and in accordance with the cause of action **Article 9**.

- Legally authorized public institutions and organizations, judicial and administrative authorities,
- Legal entities and natural persons under private law permitted by other legislations,
- Private and public institutions and organizations authorized to audit the Company,
- To business partners from whom services are received or with whom the Company cooperates for the execution and development of the Company's activities,
- To suppliers of the Company only, when necessary.

In this regard, you can withdraw the explicit consent you have given for the transfer at any time and consult with the Company's officials. The relevant data protection statements and consent statements are notified to the related persons in the form of gradual disclosure or in various ways unique to the Company's processes and activities.

5. Rights of the Data Subjects Under the Law

You may apply to Catoni at any time and request to exercise your rights arising from the Article 11 of the PDPL: "a) to learn whether your personal data has been processed, b) to demand for information if your personal data have been processed, c) to learn the purpose of the processing of your personal data and whether these personal data are used in compliance with the purpose, ç) to know the third parties to whom your personal data are transferred in country or abroad, d) to request the rectification of the incomplete or inaccurate data e) to request the erasure or destruction of your personal data under the conditions referred to in Article 7, f) to request reporting of the operations carried out pursuant to sub-paragraphs (d) and (e) to third parties to whom your personal data have been transferred, g) to object to the occurrence of a result against the person himself/herself by analyzing the data processed solely through automated systems, ğ) to claim compensation for the damage arising from the unlawful processing of your personal data". You may submit your requests regarding your rights and the enforcement of the Law by filling and signing out the application form that you can obtain from us or from www.catoni.com.tr ;

- By "Written" application by printing this form and posting its copy with wet signature to "**Ömer Avni Mah. İnönü Caddesi Devres Han No: 50/3 Gümüşsuyu, 34427 Beyoğlu/İSTANBUL**" via notary or delivering it by hand,
- By sending your application via e-mail to catonidenizisleri@hs03.kep.tr, using the registered electronic mail address (KEP) assigned to your name.
- By sending an e-mail to kvkkiletisim@catoni.com.tr using the e-mail address notified to the Company by you and registered in the company system.

As the personal data owner, in the application you will make to exercise your rights mentioned above and which contains the explanations regarding the right you have request to exercise; the requested matter needs to be clear and understandable, the subject needs to be related to yourself and in case you are acting on behalf of someone else, you will need to submit your special power of attorney certified by the notary in this regard.

In accordance with the "Communiqué on The Principles and Procedures for the Request to Data Controller", it is mandatory to include name-surname, signature, Turkish Identification ("ID") number (for foreigners, nationality, passport number or ID number if any), residential or workplace address for notice, e-mail address, telephone and fax number and the subject of the request in your applications. Applications that do not fulfill such elements will be rejected by Catoni or directed to the valid application channels.

All registered or unregistered intellectual property rights such as title, business name, trademark, patent, logo, design, information and method contained in this Site belong to the site operator and owner brand or the person signified and are under the protection of national and international law. Visiting this Site or utilizing the services on this Site does not give any rights to the intellectual property rights in question. The information contained on the Site cannot be reproduced, published, copied, presented and/or transferred in any way. The whole or part of the Site cannot be used on any other website without permission.

All employees of Catoni are equipped with education on the Law on the Personal Data Protection Law, periodically informed, highly aware and have gained the notion of confidentiality. Catoni acts with awareness and sensitivity in all activities carried out by the Company and throughout the life cycle of personal data within the Company.

Each related person who visits the www.catoni.com.tr website is deemed to have accepted the above-mentioned terms.

This data protection statement has been updated on 02.05.2025.