

POLYMETCORE TRADING SA

PRIVACY POLICY

1. Controller and Content of this Privacy Policy

We, Polymetcore Trading SA, Avenue de Rhodanie 40A, 1007 Lausanne, Switzerland (**Company**) are the operator of the website www.polymetcore.com (**Website**) and are, unless otherwise stated in this Privacy Policy, responsible for the data processing described in this Privacy Policy.

Please take note of the information below to know what personal data we collect from you and for what purposes we use it. When it comes to data protection, we primarily adhere to the legal requirements of Swiss data protection law, in particular the Federal Act on Data Protection (**FADP**), as well as the EU General Data Protection Regulation (**GDPR**), which may be applicable in individual cases.

Please note that the following information may be reviewed and amended from time to time. Therefore, we recommend regularly checking this Privacy Policy for any updates. Furthermore, for individual data processing listed below, other companies are responsible under data protection law or jointly responsible with us, so that in these cases, the information provided by those companies is also relevant.

2. Contact Person for Data Protection

If you have any questions regarding data protection or wish to exercise your rights, please contact our data protection contact person by sending an email to the following address: dataprotection@polymetcore.com.

3. Scope and Purpose of the Collection, Processing, and Use of Personal Data

3.1. Data Processing when contacting us

If you contact us through our contact addresses and channels (e.g., by e-mail, phone, or contact form), your personal data is processed. We process the data you provide us with, such as your name, email address, phone number, and your request. Additionally, the time of receipt of the request will be documented. We process this data to address your request (e.g., providing

information about our products and services, assisting with contract processing, incorporating your feedback into the improvement of our products and services, etc.).

3.2. Data Processing in connection with Video Surveillance

To ensure the safety of our customers, employees, and our property, as well as to prevent and address unlawful behaviour (in particular, theft and property damage), the entrance area and the publicly accessible areas of our Company, excluding sanitary facilities, may be monitored by cameras. The image data will only be viewed if there is a suspicion of unlawful behaviour. Otherwise, the recorded images will be automatically deleted after 72 hours. For more information regarding this data processing, please refer to the [CCTV Information Notice](#).

3.3. Data Processing in connection with Job Applications

You can apply for a position in our company either spontaneously or in response to a specific job advertisement. In both cases, we will process the personal data you provide us with. For more information regarding this data processing, please refer to the [Employee Candidates / \(Applicants\) Information Notice](#).

3.4. Data Processing for Business Purposes

We process your personal data for business purposes when you represent your employer or have a relationship with a third party, and your employer or this third party is (a potential) customer or supplier of ours or otherwise maintains a business relationship with us. For more information, please refer to the [Customer Information Notice](#).

4. Disclosure and Cross-Border Transfer

4.1. Disclosure to Third Parties and Third-Party Access

When necessary to provide services to you or to comply with our reporting obligations, your data may be shared with other companies within the Yıldırım Holding Group, particularly with Yıldırım Holding A.Ş. The legal basis for these data transfers is our legitimate interest within the meaning of Article 6(1)(f) of the GDPR.

In addition, without the support of other companies, we would not be able to provide our products and services in the desired form. To use the services of these companies, it is necessary to share your personal data with these companies to a certain extent. The disclosure of data is limited to selected third-party service providers and only to the extent necessary for the optimal provision of our services.

Various third-party service providers are explicitly mentioned in this Privacy Policy.

Your data may be disclosed to third parties to the extent necessary for the fulfilment of the contractual relationship. For these data processing activities, the third-party service providers are considered data controllers under the data protection laws, and not us. It is the responsibility of these third-party service providers to inform you about their own data processing, which may extend beyond the mere sharing of data for the provision of services, and to comply with data protection laws.

The legal basis for this data processing is the performance of a contract within the meaning of Article 6(1)(b) of the GDPR.

Furthermore, your data may be disclosed, especially to authorities, legal advisors, or debt collection agencies, if we are legally obliged to do so or if it is necessary to protect our rights, in particular to enforce claims arising from our relationship with you. Data may also be disclosed if another company intends to acquire our company or parts thereof, and such disclosure is necessary to conduct due diligence or to complete the transaction.

The legal basis for this data processing is our legitimate interest within the meaning of Article 6(1)(f) of the GDPR in protecting our rights and fulfilling our obligations, as well as in the sale of our company or parts thereof.

4.2. Transfer of Personal Data to Third Countries

We have the right to transfer your personal data to third parties located abroad if it is necessary to carry out the data processing described in this Privacy Policy. Specific data transfers have been mentioned in Section 3. When making such transfers, we will ensure compliance with the applicable legal requirements for disclosing personal data to third parties. The countries to which data is transmitted include those that, according to the decision of the Federal Council and the European Commission, have an adequate level of data protection (such as the member states of the EEA or, from the EU's perspective, Switzerland), as well as those countries whose level of data protection is not considered adequate (see Annex 1 of the Data Protection Ordinance (DPO) and [the website of the European Commission](#)). If the country in question does not provide an adequate level of data protection, we ensure that your data is adequately protected by these companies by means of appropriate safeguards, unless an exception is specified on a case-by-case basis for the individual data processing (see Article 49 of the GDPR). Unless otherwise specified, these safeguards may be provided for by

standard contractual clauses as referred to in Article 46(2)(c) of the GDPR, which can be found on the websites [of the Federal Data Protection and Information Commissioner \(FDPIC\)](#) and [the EU Commission](#). If you have any questions regarding the implemented measures, please reach out to our data protection contact person.

4.3. Information on Data Transfer to the USA

Some of the third-party service providers mentioned in this Privacy Policy are based in the USA. For the sake of completeness, we would like to inform users residing or based in Switzerland or the EU that certain third-party service providers mentioned in this Privacy Policy are located in the USA. It is important to note that there are surveillance measures by US authorities in place that generally allow for the storage of all personal data of individuals whose data has been transmitted from Switzerland or the EU to the United States. This occurs without differentiation, limitation, or exception based on the purpose for which the data is being collected and without an objective criterion that would restrict US authorities' access to the data and its subsequent use to specific, strictly limited purposes that can justify the interference associated with accessing and using the data. Furthermore, we would like to point out that affected individuals from Switzerland or the EU do not have legal remedies or effective judicial protection against general access rights of US authorities, which would allow them to access the data concerning them and to rectify or delete it. We explicitly highlight this legal and factual situation to enable you to make an informed decision regarding your consent to the use of your data.

5. Background Data Processing on our Website

5.1. Data Processing when Visiting our Website (Log File Data)

When you visit our Website, each access to our servers, located in the Turkcell Gebze Data Center, Gebze/Kocaeli, Türkiye, is temporarily stored in a log file.

The following data is collected without your intervention and stored by us until automatically deleted:

- IP address of the requesting computer;
- date and time of access;
- name and URL of the accessed file;
- website from which the access was made, if applicable, with the search word used;

- operating system of your computer and the browser you are using (including type, version, and language setting);
- device type in case of access from mobile phones;
- city or region from which the access was made; and
- name of your internet service provider.

The collection and processing of this data is carried out for the purpose of enabling the use of our Website (establishing a connection), ensuring the long-term security and stability of the system, and enabling error and performance analysis and optimisation of our Website.

In case of an attack on the network infrastructure of the Website or suspicion of other unauthorised or improper use of the Website, the IP address and other data will be analysed for clarification and defence purposes; if necessary, they may be used in civil or criminal proceedings for the identification of the respective user.

The legal basis for this data processing is our legitimate interest within the meaning of Article 6(1)(f) of the GDPR in the purposes described above.

Finally, when you visit our Website, we may use cookies, as well as other applications and tools that rely on the use of cookies. In this context, the data described here may also be processed. For more information, please refer to the subsequent sections of this Privacy Policy.

5.2. Cookies

Cookies are information files that your web browser stores on the hard drive or in the memory of your computer when you visit our Website. Cookies are assigned identification numbers that enable your browser to be identified, and allow the information contained in the cookie to be read.

Cookies may be used to make your visit to our website easier, more enjoyable, and more meaningful. We use cookies for various purposes that are necessary for the desired use of the website, i.e., "technically necessary." For example, we use cookies to identify you as a registered user after logging in, so you don't have to log in again when navigating to different subpages. The provision of ordering functions also relies on the use of cookies. Furthermore, cookies perform other technical functions necessary for the operation of the website, such as load balancing, which distributes the workload of the site across various web servers to

relieve the servers. Cookies are also used for security purposes, such as preventing the unauthorized posting of content. Finally, we use cookies in the design and programming of our website, for example, to enable the uploading of scripts or codes.

The legal basis for this data processing is our legitimate interest within the meaning of Article 6(1)(f) of the GDPR in providing a user-friendly and up-to-date website.

Most internet browsers accept cookies automatically. However, when accessing our website, we ask for your consent to the use of non-essential cookies, especially for the use of cookies from third parties for marketing purposes. You can adjust your preferences for cookies by using the corresponding buttons in the cookie banner. Details regarding the services and data processing associated with each cookie can be found within the cookie banner and in the following sections of this Privacy Policy.

You may also be able to configure your browser to prevent cookies from being stored on your computer or receive a notification whenever a new cookie is being sent. On the following pages, you will find instructions on how to configure cookie settings for selected browsers.

- [Google Chrome for Desktop](#)
- [Google Chrome for Mobile](#)
- [Apple Safari](#)
- [Microsoft Windows Internet Explorer](#)
- [Microsoft Windows Internet Explorer Mobile](#)
- [Mozilla Firefox](#)

Disabling cookies may prevent you from using all the features of our Website.

You can find more information on the cookies we use by [clicking here](#).

5.3. Tracking and Web Analytics Tools

For the purpose of customising and continuously optimising our Website, we may use the web analytics services. In this context, pseudonymised usage profiles are created, and cookies are used. The information generated by the cookie regarding your use of our Website is usually transmitted to a server of the service provider, where it is stored and processed, together with the Log File Data mentioned in Section 6.1. This may also result in a transfer to servers

abroad (for information on the absence of an adequate level of data protection and the proposed safeguards, see Sections 5.2 and 5.3).

Through the data processing, we obtain, among others, the following information:

- navigation path followed by a visitor on the site (including content viewed, products selected or purchased, or services booked);
- time spent on the Website or specific page;
- the specific page from which the Website is left;
- the country, region, or city from where an access is made;
- end device (type, version, colour depth, resolution, width, and height of the browser window); and
- returning or new visitor.

The provider, on our behalf, will use this information to evaluate the use of the Website, in particular to compile Website activity reports and provide further services related to Website usage and internet usage for the purposes of market research and the customisation of the Website. For these processing activities, we and the providers may be considered joint controllers in terms of data protection to a certain extent.

The legal basis for this data processing with the following services is your consent within the meaning of Article 6(1)(a) of the GDPR. You can withdraw your consent or object to processing at any time by rejecting or deactivating the relevant cookies in the settings of your web browser or by using the service-specific options described below.

Regarding the further processing of the data by the respective provider as the (sole) controller, including any potential disclosure of this information to third parties, such as authorities due to national legal regulations, please refer to the respective privacy policy of the provider.

5.3.1. Google Analytics

We use the web analytics service Google Analytics provided by Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland, or Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (**Google**).

IP addresses are not logged or stored in Google Analytics. For accesses originating from the EU, IP address data is only used to derive location data and is immediately deleted thereafter. When collecting measurement data in Google Analytics, all IP searches take place on EU-based servers before the traffic is forwarded to Analytics servers for processing. Google Analytics utilises regional data centres. When connecting to the nearest available Google data centre in Google Analytics, the measurement data is sent to Analytics via an encrypted HTTPS connection. In these centres, the data is further encrypted before being forwarded to Analytics' processing servers and made available on the platform. The most suitable local data centre is determined based on the IP addresses. This may also result in a transfer of data to servers abroad, e.g., the USA (for information on the absence of an adequate level of data protection and the proposed safeguards, see the section "Disclosure and Cross-Border Transfer").

Users can prevent the collection of data related to their Website usage (including IP address) generated by the cookie as well as the processing of this data by Google by downloading and installing the browser plugin available at the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en-GB>.

The transfer of your personal data to Google is based on a data processing agreement. Google may process personal data outside the EU/EEA. The transfer of personal data is safeguarded via standard contractual clauses (see section "Disclosure and Cross-Border Transfer").

5.4. Social Media Profiles

Our Website contains links to our profiles on the social networks of the following providers:

- Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, Ireland, [Privacy Policy](#);
- LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland, [Privacy Policy](#).
- Glassdoor Hiring Solutions Ireland Ltd. 70 Sir John Rogerson's Quay, Dublin 2, Dublin [HR Tech Privacy](#).

If you click on the icons of the social networks, you will be automatically redirected to our profile on the respective network. This establishes a direct connection between your browser and the server of the respective social network. As a result, the social network receives

information that you have visited our Website with your IP address and clicked on the link. This may also involve the transfer of data to servers abroad, e.g., in the USA.

If you click on a link to a social network while you are logged into your user account on that social network, the content of our website can be associated with your profile, allowing the social network to directly link your visit to our website to your account. If you want to prevent this, please log out of your account before clicking on the respective links. A connection between your access to our website and your user account will always be established if you log in to the respective social network after clicking on the link. The data processing associated with this is the responsibility of the respective provider in terms of data protection. Therefore, please refer to the privacy notices on the social network's website.

The legal basis for any data processing attributed to us is our legitimate interest within the meaning of Article 6(1)(f) of the GDPR in the use and promotion of our social media profiles.

6. Retention Periods

We only store personal data for as long as it is necessary to carry out the processing described in this privacy policy within the scope of our legitimate interests. For contractual data, the storage is stipulated by statutory retention obligations. Requirements that oblige us to retain data arise from the accounting and tax law regulations. According to these regulations, business communication, concluded contracts, and accounting documents must be retained for up to 10 years. If we no longer need this data to provide services for you, the data will be blocked. This means that the data may then only be used if this is necessary to fulfil the retention obligations or to defend and enforce our legal interests. The data will be deleted as soon as there is no longer any legal obligation to retain it and no legitimate interest in its retention exists.

7. Data Security

We use appropriate technical and organisational security measures to protect your personal data stored with us against loss and unlawful processing, in particular unauthorised access by third parties. Our employees and the service companies mandated by us are obliged to maintain confidentiality and uphold data protection. Furthermore, these persons are only granted access to personal data to the extent necessary for the performance of their tasks.

Our security measures are continuously adapted in line with technological developments. However, the transmission of information via the Internet and electronic means of

communication always involves certain security risks and we cannot, therefore, provide any absolute guarantee for the security of information transmitted in this way.

8. Your Rights

If the legal requirements are met, as a data subject, you have the following rights with respect to data processing:

Right of access: You have the right to request access to your personal data stored by us at any time and free of charge if we process such data. This gives you the opportunity to check what personal data concerning you we process and whether we process it in accordance with applicable data protection regulations.

Right to rectification: You have the right to have inaccurate or incomplete personal data rectified and to be informed about the rectification. In this case, we will also inform the recipients of the data concerned about the adaptations we have made, unless this is impossible or involves disproportionate effort.

Right to erasure: You have the right to obtain the erasure of your personal data under certain circumstances. In individual cases, particularly in the case of statutory retention obligations, the right to erasure may be excluded. In this case, the erasure may be replaced by a blocking of the data if the requirements are met.

Right to restriction of processing: You have the right to request that the processing of your personal data be restricted.

Right to data portability: You have the right to receive from us, free of charge, the personal data you have provided to us in a readable format.

Right to object: You have the right to object at any time to data processing, especially with regard to data processing related to direct marketing (e.g., marketing emails).

Right to withdraw consent: You have the right to withdraw your consent at any time. However, processing activities based on your consent in the past will not become unlawful due to your withdrawal.

To exercise these rights, please send us an e-mail to the following address:

dataprotection@polymetcore.com.

Right of complaint: You have the right to lodge a complaint with a competent supervisory authority, e.g., against the manner in which your personal data is processed.
