**DEVBULK GEMİ İSLETMECİLİĞİ ANONİM SİRKETİ / DEVBULK SHIP MANAGEMENT STOCK JOINT COMPANY**

**DISCLOSURE NOTIFICATION ON PROTECTION OF PERSONAL DATA**

This Notification and Disclosure Form has been issued under the scope of processing and transferring personal data of real persons organized by Law on Protection of Personal Data with number 6698 (**“PDPA”**) any updated information shall be considered "Personal Data" belonging thereto that you share with Devbulk Gemi İşletmeciliği A.Ş. (**“DEVBULK”**) under the scope of PDPA.

The security of your personal data is of great importance for DEVBULK, your personal data shall be stored in accordance with the conditions laid down by the legislation, in the safest possible way and for as long as legal obligations require, under applicable conditions

**1. Data Controller and Data Representative**

Your personal data as per PDPA shall be processed by DEVBULK as "Data Controller" in the following explanations.

* **2. What Purpose Your Personal Data Can Be Processed**

Personal data collected by DEVBULK can be processed under the terms and conditions of personal data processing set forth in Articles 5th and 6th of KVK in order to fulfill the obligations of DEVBULK and real and legal persons in business relations with DEVBULK, to be informed about the updates, to execute the agreements to be made by you, and to remind and fulfill legal obligations in relation to the performance of the agreement, various ship management and shipbuilding activities, activities carried out in relation to ship agencies, relations with travel companies, procedures carried out with local authorities, flag state and port state in accordance with national and international legislation, the banks to be work with, activities carried out the need for insurance companies, subcontractors and suppliers’ services, the presentation of a safe and high quality shipbuilding activity in line with the basic objectives of the classification society and operation.

* **3. Personal Data to which Processed Personal Data can be Transferred and Transfer Purposes**
* Your personal data collected by DEVBULK is processed for specific, clear and legitimate purposes, in compliance with the rules of law and honesty, in accurate and up to date manner, in accordance with the principles of law and honesty, linked to the purpose for which they are being processed, limited and measured, in accordance with conservation principles for the period required for the purposes for which they are prescribed or covered by the relevant legislation. In addition, in order to comply with the requirements set forth in Articles 8 and 9 of the PDPA and to take necessary security measures, limited to the purposes listed under the heading of Article 2 of this declaration, it may be transferred by indirect/direct domestic/foreign subsidiaries or affiliates, DEVBULK to the domestic/foreign / international, public/ private institutions and organizations, companies and other third persons or organizations receiving service / support / consultancy or cooperated or being project / financing partner, DEVBULK's affiliated companies, consultants, shareholders or solution partners, the Central Registry Agency and other competent institutions and organizations, suppliers or subcontractors. DEVBULK may process and store your personal data in servers inside or outside of Turkey or other electronic media.
* **4. The Method of Collection of Your Personal Data and the Legal Reason**

Your personal data may be acquired by the offices and other physical environments, call centers, internet sites, mobile applications and similar electronic transaction platforms, social media or other public open channels in which DEVBULK's headquarters, agencies, other subcontractors or business partners can communicate with, by DEVBULK in different ways. Your personal data may be collected, processed, transmitted and stored for purposes set forth in items 2 and 3 of this text within the context of the personal data processing requirements and purposes set forth in Articles 5 and 6 of the PDPA.

Your Personal Data is stored in compliance with the legislative requirements, as long as it is permitted by the relevant legislation.

* **5) Your Rights As Personal Data Subject**

If, as personal data subjects, you submit your request with regard to the rights to DEVBULK in the manner set out below, DEVBULK shall conclude your claim as soon as possible and within thirty days at the latest. To learn whether personal data is processed or not,

* Requesting information about personal data if it has been processed,
* To learn the purpose of processing personal data and whether they are used appropriately for their purpose,
* Knowing the third parties to which personal data are transferred in Turkey or abroad,
* If personal data is missing or incorrectly processed, requesting them to be corrected and requesting that the process carried out within this scope be notified to the third party to which the personal data is transmitted,
* Although it has been processed in accordance with the provisions of the PDPA and other relevant laws, in case of disappearance of the reasons for the need to be processed, requesting that personal data is deleted or destroyed, and requesting that third parties are notified of the processing carried out in this context,
* Objection to the occurrence of a result against the person himself by analyzing the processed data exclusively through automated systems,
* Personal Data Subject shall have the right to claim damages, in case of being damaged due to the processing of personal data unlawfully.

In accordance with paragraph 1 of Article 13 of the PDPA, you may submit your request in writing to DEVBULK regarding your exercise of your rights as set forth above. By completing the form (**ANNEX**) of your claim which contains your explanations of your right to use the rights stated in Article 11 of the PDPA, you can directly send a copy of a wet signed copy of the form addressed to DEVBULK directly to the address "Altunizade Mahallesi Fahrettin Kerim Gökay Caddesi Denizciler İş Merkezi B Block No: 18 K: 3 Üsküdar / Istanbul or send it via the Notary channel

DEVBULK shall reserve the right to make changes in this notification of disclosure due to possible changes in the PDPA and the methods to be determined by the Personal Data Protection Board.

**ANNEX**

**DEVBULK SHIP MANAGEMENT** **JOINT STOCK COMPANY APPLICATION FORM**

Certain rights in relation to the processing of personal data in the article 11 of PDPA have been granted to the personal data subjects (Hereinafter referred to as “Data Subject”) defined as the relevant person on the Law on Personal Data Protection Act No 6698 ("PDPA"), application are required to be made to DEVBULK, which is the data controller under the same law, in relation to such rights. Applications to be made to DEVBULK in “writing” in this regard should be required to be transmitted with identity verification obtaining output of the form or through the notary public.

**Contact Address:** Altunizade Mah. Fahrettin Kerim Gokay Cad. Denizciler Is Merkezi B Blok No: 18 K: 3 Üsküdar İstanbul

**Information To Be Specified in the Submission of Application:** The "Protection of Personal Data Law Information Request" should be written on the envelope.

Your application submitted to DEVBULK in accordance with paragraph 2 of Article 13 of the PDPA, it shall be responded in accordance with the nature of the request “ as soon as possible and no later than thirty days” from the date on which your request has reached us. Our responses shall be served in writing or electronic media in accordance with Article 13 of the related PDPA.

1. **Contact information of the applicant:**

Name :

 Surname :

 Turkish Id No :

 Telephone No :

 E-mail :

 Address :

1. **Please indicate your relationship with DEVBULK.**

|  |  |
| --- | --- |
| CUSTOMER |   |
| BUSINESS PARTNER  |   |
| EMPLOYEE |   |
| APPLYING FOR A JOB  |   |
| SHAREHOLDER |   |
| OTHER |   |

**C.** **Please provide details of your request under the PDPA:**

1. **Please select the method by which you will be notified of your response:**

|  |  |
| --- | --- |
| I would like it to be sent to my e-mail address.  |   |
| I would like to take delivery by hand. (In case of obtaining by proxy, it must be notarized power of attorney or authorization certificate.  |   |

This application form determines the relationship with DEVBULK, if any, it is issued to be accurate, complete and legal in order to be answered in its lawful manner for your application in relation to your personal data processed by DEVBULK. DEVBULK shall reserve the right to request additional documents (Identification document or driver's license etc.) for identification and authorization determination, in order to eliminate the legal risks that may arise from data sharing unlawfully and unjustly, and in particular to ensure the safety of your personal data, if the information about your requests you are communicating under the form is not accurate and up to date or if an unauthorized application is made. DEVBULK does not accept liability for such claims due to incorrect information or unauthorized applications. DEVBULK shall reserve the right to make changes in PDPA and to make changes to this form due to the methods to be determined by the Personal Data Protection Board.

 Personal Data Subject’s Name Surname :

 Application Date :

 Signature :