

ACCURIDE WHEELS BİLECİK JANT SANAYİ A.Ş.

CLARIFICATION TEXT ON PROCESSING OF PERSONAL DATA FOR PROSPECTIVE EMPLOYEES

This document has been prepared in order to enlighten you on the processing of your personal data within the framework of Article 10 of the Law on the Protection of Personal Data No. 6698 ("Law").

Dear Prospective Employee,

1. Who Processes Your Data?

In terms of the personal data we obtain, we, as **Accuride Wheels Bilecik Jant Sanayi A.Ş.** located at the address "Fatih Mahallesi, Sanayi Küme evler Bölgesi No:44 Bayırköy Beldesi, 11230, Merkez/Bilecik" (hereinafter will refer to as "Company") (www accuridecorp.com/tr), in the capacity of Data Controller in accordance with the Law, process your personal data that we request and share with us within the scope of the purpose that requires processing and in connection with this purpose, in a limited and measured way, keeping the accuracy and the most up-to-date form, within the scope described below.

2. For What Purposes And For Which Legal Reasons Do We Process Your Personal Data?

According to the Labor Law No. 4857, Law of Obligations No. 6098, Article 419, Law No. 6698 on the Protection of Personal Data and relevant legislation, our Company may process personal data such as name, address, date of birth, e-mail address, telephone number and other contact information, CV, cover letter, previous or relevant work experience or other experience, educational background, transcript, language test results, or supporting or explanatory documents related to the job application, Skype, video conference, telephone, or records of information obtained during the interview in case of face-to-face interviews, and the references stated in the job application of the **Prospective Employees** who applied for job.

Establishing your employment contract, especially by evaluating your competencies, constitutes our basic legal basis for processing personal data. In the context of your candidacy, it is strongly recommended that the you refrain from specifying any personal information and especially sensitive (sensitive) data that are not directly related to your competencies (race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, dress and dress, association, foundation or union membership, health, sexual life, biometric and genetic data), and if there are relevant parts of the CV and documents you submitted in writing, they should be darkened and delivered to us.

In addition, for the personal data (name, surname, telephone, e-mail, etc.) of the reference person(s) in your resume, we strongly recommend that you inform us about such reference persons, knowing that it is your responsibility to inform the person in question and to obtain their explicit consent in the first place. In the recruitment process, we can apply recruitment tests that determine talent and personality traits, and we can cooperate with organizations specialized in this field. The results of the aforementioned tests are shared with you upon your request and are retained in your personal file in case you are employed. We can also cooperate with expert assessment organizations during interview processes. **We request your explicit consent for the purpose of conducting the said assessments and tests and sharing your data in cooperation with experts and institutions in this field (1).**

3. For What Purposes And For Which Legal Reasons Do We Transfer Your Personal Data?

In order to carry out the recruitment and assessment processes of our company and to evaluate your application, your personal data may be transferred in a limited and measured manner. In this context, your personal data may be transferred to authorized persons working under a confidentiality agreement as a "Data Processor" in general (*such as OGSBs, Hosting Services, Database Maintenance services, HR-Recruitment Consultancy, Evaluation/Assessment Organizations*), although not within our Company, provided that it is in connection with the purpose of recruitment.

Apart from those, your data may be shared with the Judicial Authorities on the legal basis that data processing is mandatory for the establishment, exercise or protection of a right (for example, with the courts in case of a dispute in recruitment processes); and with the Administrative Authorities (for example, requests from the KVKK Institution, requests from SSI, Turkish Employment Agency) with the legal basis of the situations envisaged in the law and the fulfillment of the legal obligation; With Academic Institutions (for example, to verify the accuracy of the information you provide regarding your diploma); with the legal basis of our company's legitimate interests and the establishment of the employment contract; with your reference persons (with the legal basis of the establishment of your employment contract and the legitimate interests of our Company); in connection with processes such as mergers and acquisitions related to our company (fulfillment of legal obligation, legal basis of our company's legitimate interest); with Insurance Companies, SSI, Tax and Legal Consultants (on the legal basis of our company's legitimate interests and the necessity of data processing for the establishment, exercise or protection of a right); and exceptionally, for the purposes of being obligatory for the protection of life or physical integrity of the person or another person who is unable to express his or her consent due to the actual impossibility stipulated in Article 5 of the Law or whose consent is not legally valid (for example, with health institutions in case you get sick during a job interview).

a) Within the Structure of Accuride

Accuride limits access to personal data to those in the company who "need to know" that information. For example, certain employees at Accuride may access your personal data to process your application and manage the recruitment process. As a global company that does business across national borders, there may be situations where these "need-to-know" information needs to be transferred to Accuride in another country, including countries that offer no or less protection for personal data. When you apply for a job through our website www.accuridecorp.com, your data reaches us via the USA where hosting is located, under the control of Accuride Corporation ("AWNA").

Regarding the joint work of Accuride, especially in connection with abroad, data transfer to Accuride Corporation in the USA and Accuride Wheels Solingen GmbH ("Accuride Solingen") and Accuride Wheels Europe & Asia GmbH ("AWEA") located in Germany may be necessary. For example, CVs and personal data may be requested by these Companies for certain positions . **Accordingly, considering the current situation regarding safe countries, we request your explicit consent to share your personal data with AWNA, AWEA and Accuride Solingen (2).**

(b) Apart from Accuride

We may share your personal data with authorized Third Party Service providers to conduct and manage the Accuride's recruitment process. For example, we may share your personal data for the purpose of reviewing and verifying your application and the information you provide to us. This includes validation of academic and professional qualifications. Except for our Third Party Service Providers, we only disclose your personal data to third parties outside of Accuride:

- when Law so requires;
- in response to a request for legal aid by the police or other law enforcement agencies; and/or
- To seek legal advice from Accuride's non-in-house attorneys or in connection with a litigation with a third party.

In some cases, during the continuation of the activities, it is necessary to share your personal data with the relevant institutions, etc., Accuride's suppliers, shareholders, and similar third-party service providers. During this transfer, both Accuride and the third-party service provider sign confidentiality agreements that guarantee the security of your personal data. **We require your express consent to make such a transfer. (3)**

4. Security and Retention of Your Personal Data

We always aim to retain your personal data in the most secure way and only for the period necessary to achieve the purpose of the transaction. With this in mind, we take the necessary physical, technical and organizational measures to prevent, as far as possible, the alteration or loss or unauthorized access of your data. We store your personal data in secure environments, and if it is to be transferred, we take the necessary measures in this regard.

All personal data collected and processed about you during the recruitment processes are transferred to the personnel file if Prospective Employee is decided to be employed in the relevant vacant position and are retained subject to the retention periods within the scope of the employee's personal information. If you are not employed, your personal data that you have given as a candidate shall be retained for a maximum of 2 years. In the event of a criminal act, your personal data shall be retained for the duration of the lawsuit and penalty timeouts specified in the Turkish Penal Code.

5. How Do We Collect Your Personal Data?

We derive most of the personal data we process from the information you provide to us. Again, in some cases, your personal data may reach us from the data in the systems established by your reference persons or public institutions and organizations due to the requirements of working life. The information we process can be collected by non-automatic methods such as paper media (surveys, application forms), or by automatic methods such as documents sent via e-mail or web forms.

6. What Are Your Rights Regarding Your Personal Data?

In accordance with 11th Article of the Law, you have the following rights: a) To learn whether your personal data is already processed or not; b) If your personal data is already processed, to request information thereabout; c) To learn the purpose of processing of your personal data, and whether your personal data is used for the intended purposes or not; ç) To learn and know the identity of third parties to whom your personal data is disclosed or transferred at home or abroad; d) If your personal data is processed incompletely or inaccurately, to request correction or completion of them; e) Requesting the deletion / destruction of your personal data within the framework of the conditions stipulated in Article 7 of the Law; 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 you 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.

In order to exercise your above-mentioned rights, you can personally send your request to our Company's address "Fatih Mahallesi, Sanayi Küme evler Bölgesi No:44,Bayırköy Beldesi Merkez/Bilecik, Türkiye 11230" with documents identifying your identity, by filling out the form on our Company's website, including the necessary information to identify you and your explanations regarding your right to exercise the rights set forth in Article 11 of the Law, you can also send it through a notary public or by registered e-mail to our Company's registered e-mail address **accuride.kvkk@hs01.kep.tr**, or you can apply through other methods determined by the Institution. You can find detailed information about the processing and protection of personal data by reviewing the Personal Data Processing and Protection Policy published on our company's website.

I have received, read, and understood the above clarification text.

Prospective Candidate Who Received the Clarification Text:

Full Name:

Signature:

ACCURIDE WHEELS BİLECİK JANT SANAYİ A.Ş.

EXPLICIT CONSENT TEXT ON PROCESSING OF PERSONAL DATA FOR PROSPECTIVE EMPLOYEES

*In line with the purposes specified in the **Clarification Text on the Processing of Personal Data** by **Accuride Wheels Bilecik Jant Sanayi A.Ş.**, we submit to your approval the lawful processing of your personal data for the following purposes. **Please clearly provide your explicit consent for the processing of your personal data by marking (Y) Yes or (N) No below.***

1	Please specify if you allow the sharing of your data for the purpose of assessment and testing for the execution of recruitment activities and cooperation with experts and institutions in this field, taking into account the clarification text.	
2	Please specify if you allow the transfer of your personal data to the specified persons and organizations abroad, taking into account the clarification text.	
3	Please specify if you allow your personal data to be shared with third-party service providers, taking into account the clarification text.	

I hereby acknowledge that I explicitly consent, with my free will based on clarification, to the processing of my personal data in the above-mentioned matters, that I have received, read, and understood the clarification text.

Full Name:

Signature: