TRN

SHIPPING & LOGISTICS

KVKK INFORMATION NOTICE AND PRIVACY POLICY

DATA CONTROLLER

TRN Denizcilik Sanayi ve Ticaret Anonim Sirketi

Deniz Mahallesi, Hurriyet Caddesi No: 195

Derince / Kocaeli, Türkiye

Document information

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Prepared pursuant to Law No. 6698 on the Protection of Personal Data.

SECTION I

KVKK Information Notice for Website Visitors

This notice has been prepared to provide information about the personal-data processing activities carried out when www.trndenizcilik.com.tr is visited and when a contact or quotation request is submitted through the website.

1. Identity of the data controller

Pursuant to Law No. 6698 on the Protection of Personal Data (the Law), the data controller is TRN Denizcilik Sanayi ve Ticaret Anonim Sirketi (TRN or the Company).

Trade name	Contact details
TRN Denizcilik Sanayi ve Ticaret Anonim Sirketi	Deniz Mahallesi, Hurriyet Caddesi No: 195, Derince/Kocaeli
Tax office / tax no.	Derince Tax Office / 8591532344
Telephone	0262 239 70 66

2. Personal data processed, purposes, and legal grounds

TRN processes only the personal data necessary for use of the website and communication with you, for the specific purposes and on the legal grounds set out below.

Data category	Purposes of processing	Legal ground
Identity and contact	Processing name, surname, telephone, and email details to establish contact, answer questions, and receive and follow up quotation/service requests.	Law Art. 5/2-c: necessary for the establishment or performance of a contract; Art. 5/2-f: legitimate interests, provided that fundamental rights are not harmed.
Customer transaction and professional information	Processing company/institution name, requested service, operational information, and message content to assess needs, prepare operations/quotations, and manage the business relationship.	Law Art. 5/2-c: pre-contractual process or performance of a contract; Art. 5/2-e: establishment, exercise, or protection of a right.
Transaction security	Processing IP address, access time, server logs, browser/device data, and security-event logs to secure the site, prevent misuse, and resolve technical issues.	Law Art. 5(2)(ç): compliance with a legal obligation; Art. 5(2)(f): legitimate interests relating to information security and service continuity.
Analytics and marketing	Processing preference, cookie ID, and website-usage data for performance measurement, experience improvement, or marketing only where the relevant tools are used and the required permission has been obtained.	Law Art. 5/1: explicit consent for non-essential cookies where no other processing condition applies.

Important: TRN does not request special-category personal data through contact or quotation forms. Please do not enter special-category information - such as health, biometric/genetic data, criminal convictions, or religious or political opinions - in free-text fields.

3. Method of collecting personal data

Personal data is collected electronically through contact or quotation forms on the website, emails sent to the Company, telephone calls, browser and server logs, and - to the extent used - cookies. It is collected by wholly or partly automated means or by non-automated means, provided that the processing forms part of a data filing system.

4. Transfers of personal data

Your personal data may be transferred, in a limited and proportionate manner and solely for the purposes above, to suppliers providing hosting, information technology, cyber-security, maintenance, and communication services; legal and financial advisers; contracted business partners where necessary to fulfil a request; and legally authorised public institutions and organisations, in accordance with Article 8 of the Law.

As a rule, contact and quotation data is processed in Türkiye. If use of an analytics, embedded-content, cloud, or similar service based outside Türkiye gives rise to an international transfer, the transfer will be carried out on the applicable basis under Article 9 of the Law: an adequacy decision, appropriate safeguards, or an exception prescribed solely for incidental cases. The services used and transfer information will be disclosed, where applicable, in the relevant cookie preference panel or in a separate notice.

5. Retention and disposal

Personal data is retained only for the period required by the relevant processing purpose, taking into account the statutory retention and limitation periods prescribed by applicable legislation (including the Turkish Code of Obligations and the Turkish Commercial Code), the service/quotation process, legal obligations, and potential disputes. When those periods expire or the grounds for processing cease to exist, the data is deleted, destroyed, or anonymised in accordance with applicable legislation and the Company's retention and disposal practices. Cookie retention periods, where relevant, are shown separately in the cookie preference panel.

6. Rights under the Law and applications

Data subjects may exercise their rights under Article 11 of the Law. In accordance with the Communique on the Procedures and Principles for Applications to the Data Controller, requests may be submitted in person or in writing to the address below, with sufficient information to establish the applicant's identity and describe the request:

TRN Denizcilik Sanayi ve Ticaret Anonim Sirketi
Deniz Mahallesi, Hurriyet Caddesi No: 195, Derince/Kocaeli

The application must include the applicant's name and surname; signature for written applications; Turkish ID number (nationality and passport/identity number, if any, for foreign nationals); address for service; email/telephone details, if any; and the subject of the request. Additional information that is necessary and proportionate may be requested to verify identity. Applications are concluded as soon as possible and no later than 30 days; if the process entails an additional cost, the tariff prescribed by applicable legislation may apply.

This information notice is not an explicit-consent text, and you are not asked to approve it. If processing requiring explicit consent is undertaken, the relevant text and preference will be presented separately.

SECTION II

Website Privacy Policy

This policy explains how TRN protects the privacy of people who visit its corporate website, the framework within which website data is used, and the controls available to users.

1. Purpose and scope

This policy applies to the www.trndenizcilik.com.tr domain, pages linked to that domain, and the contact/quotation functions on the website. Data-processing activities concerning other groups of data subjects - such as employees, job applicants, suppliers, customer operations, or visitors to physical facilities - are governed, where necessary, by separate information notices.

2. Our privacy principles

- We process personal data lawfully and fairly, accurately, and, where necessary, keep it up to date.
- We use data for specified, explicit, and legitimate purposes in a manner that is relevant, limited, and proportionate to those purposes.
- We retain data only for as long as required by the processing purpose or applicable legislation.
- We implement appropriate technical and organisational measures against the risks of unauthorised access, loss, alteration, and disclosure.

3. Data generated when you use the website

When the website is visited, limited technical information may be generated as a natural consequence of the internet connection, including the IP address, access date/time, requested page, referring page, browser/operating-system details, and error logs. This information is used to operate the website, detect security incidents, maintain service continuity, and monitor technical performance.

4. Contact and quotation requests

When you submit a contact or quotation form, the information you provide is used solely to assess your request, respond to you, determine the necessary operational or service scope, and manage a potential business relationship. You should not share personal data that is not requested in the form and is unrelated to the service, especially special-category information.

5. Cookies and similar technologies

Cookies are small text files stored on your device by the website. Strictly necessary cookies may be used without explicit consent for the operation and security of the site. Functional, analytics/performance, or advertising/marketing cookies are enabled only with your prior explicit consent where no other legal ground applies; these cookies are disabled by default.

Category	Purpose	Control
Strictly necessary	Core site functions, security, network management, and recording preferences.	Required for the site to operate; may be restricted in the browser, but some functions may be impaired.
Functional	Remembering language, display, or similar user preferences.	Can be enabled or disabled in the preference panel, where available.
Analytics / performance	Measuring aggregate website use and improving the experience.	Enabled with explicit consent to the extent required.
Advertising / marketing	Interest-based content and campaign measurement.	Enabled with explicit consent to the extent required.

You may change your cookie preferences at any time through the preference panel on the website or delete cookies through your browser settings. The name, provider, purpose, and retention period of cookies are kept current in the preference panel once the technologies used have been determined.

6. Third-party services and links

The website may contain third-party services such as maps, video, analytics, or social-media links. Once activated, those services may process data under their own terms and privacy practices. TRN is not responsible for the independent privacy practices of third-party applications; we recommend reviewing the policy of the relevant service. Non-essential embedded content is not activated, where required, before the user's preference has been obtained.

7. Information security

TRN implements appropriate measures - including restricted access privileges, current software and security controls, logging/monitoring, backup, and supplier management - to prevent unlawful processing of and access to personal data and to ensure secure data retention. Although absolute security cannot be guaranteed due to the nature of data transmission over the internet, identified incidents are managed in accordance with applicable legislation.

8. Children's privacy

The website is not directed at children, and TRN does not knowingly seek to collect personal data from children. If you believe that personal data relating to a child has been shared unlawfully, you may contact TRN so that the data can be reviewed and the necessary action taken.

9. Changes to this policy

This policy may be updated when legislation, the technologies used, or Company processes change. The current version is published on the website together with its publication date and version number. Material changes may also be announced through appropriate methods.

10. Contact

For questions about our privacy practices, you may contact TRN by telephone at 0262 239 70 66 or at the address below. Requests to exercise rights under the Law must be submitted using the application procedure described in Section I, Article 6.

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Tax Office / No.: Derince Tax Office / 8591532344
Web: www.trndenizcilik.com.tr

Legal basis: Law No. 6698 on the Protection of Personal Data; the Communique on the Procedures and Principles to Be Followed in Fulfilling the Obligation to Inform; the Communique on the Procedures and Principles for Applications to the Data Controller; and relevant secondary legislation.