Privacy Policy

Definitions

- The Company, or, the Data Controller

  The Company means Lupamat Makina Sanayii A.Ş
  (herein after referred to "We" or "LUPAMAT"

  Contact Details:
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  Tel: +90 232 376 87 10 (pbx) | Mobile : +90 532 626 54 80 | Fax: +90 232 328 04 74
  Web: www.lupamat.com | Email: info@lupamat.com

  Contact Person :
  Pınar Kekeç | HR Department Manager
  E-mail : (pinarkekec@lupamat.com)

- Data Controller

  Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

- Data Processor

  Data Processor means any natural or legal person who processes the data on behalf of the Data Controller.

- Data Subject

  Data Subject is any living individual who is using our Service and is the subject of Personal Data.

- Personal Data

  Means any information relating to an identified or identifiable natural person

- GDPR

  EU General Data Protection Regulation (No.2016/679)

- PDPL

  Personal Data Protection Law (No. 6698) of the Republic of Turkey

1. Principles for processing personal data

As the Data Controller, Our principles for processing personal data are:

- *Fairness and lawfulness*. When we process personal data, the individual rights of the Data Subjects must be protected. All personal data must be collected and processed in a legal and fair manner.
- *Restricted to a specific purpose*. The personal data of Data Subject must be processed only for specific purposes.
- *Transparency*. The Data Subject must be informed of how his/her data is being collected, processed and used.

2. What personal data we collect and process

LUPAMAT collects several different types of personal data for various purposes. Personal Data may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address

3. For what purposes we use the personal data

The data obtained will be processed for a number of purposes laid down in Information Notice shared by LUPAMAT regarding the processing. The company use the collected personal data:

- To robustly plan and implement our human resources policies,
- provide you with product or services
- To correctly plan and execute our commercial partnerships and strategies;
- notify you about changes to our products or services
- To ensure the legal, commercial and physical security of our company and business partners,
- To plan and execute the supply chain management processes,
- To gather analysis or valuable information so that we can improve our services
- To determine the strategies related to the administrative and production processes of the company, and, ensure the organizational functioning in compliant with our strategic plans and targets.
- To detect, prevent and address technical issues

4. Legal basis for collecting and processing personal data

LUPAMAT, Turkey's strongest compressor manufacturer, have put in place appropriate and technical measures in order to process and protect personal data of individuals related to our company in accordance with both the Personal Data Protection Law (Law No. 6698, "PDPL") and GDPR, No: 2016/679.

The Company processes personal data in compliance with provisions laid down in both data protection laws, within the framework of;

a) the performance of a contract or in order to take steps prior to entering into a contract
b) the compliance with a legal obligation
c) legitimate interests

We also collect and process personal data to pursue legitimate interests in the following situations:

- ✓ Processing of general requests for our products and services
- ✓ Advertising or market research
- ✓ Assertion of legal claims and defense in legal disputes
- ✓ Ensuring IT operations and IT security
- ✓ Measures for building and system security (e.g. access authorizations)
- ✓ Measures to improve our internal business processes and product optimization

d) consent
In some situations, the processing of your personal data is not absolutely necessary and only permitted with your consent. We inform you about this circumstance and in particular about the fact that giving your consent is voluntary and revocable at any time with effect for the future.

5. Retention of personal data

We will retain your personal information only for as long as is necessary for the purposes set out in this Data Protection Policy. And more importantly, we will retain and use your information to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our policies.

6. Your rights as a Data Subject

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. If you wish to be informed what personal data we hold about you and if you want it to be removed from our systems, please contact us via Contact Person (pinarkekec@lupamat.com) mentioned above.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have about you
- The right of rectification
- The right to object
- The right of restriction
- The right to data portability
- The right to withdraw consent