

 ALPHA PLUS LIGATIO METALLICA	PERSONAL DATA PROTECTION POLICY	Doküman No	PLT009
		İlk Yayın Tarihi	27.07.2025
		Gözden Geçirme Tarihi	05.01.2026
		Revizyon Tarihi	
		Revizyon No	
		Sayfa No	1/5

Scope: Alloy Production, Sales and Export of Precious and Base Metals

1. Purpose and Scope

This Personal Data Protection Policy is an integral part of the Alpha Plus Code of Ethics and sets out the principles governing the lawful, fair, transparent and secure processing of personal data.

Alpha Plus commits to full compliance with:

- Turkish Law No. 6698 on the Protection of Personal Data (KVKK)
- EU General Data Protection Regulation (GDPR – Regulation (EU) 2016/679)
- Applicable secondary legislation and authority decisions
- Responsible Jewellery Council (RJC) Code of Practices 2024

Territorial Scope (GDPR Article 3): This policy applies where Alpha Plus processes the personal data of individuals located in the European Union (including customers, suppliers, business partners, employees and website users), regardless of whether the processing takes place within or outside the EU.

2. Definitions

For the purposes of this policy:

- Personal Data: Any information relating to an identified or identifiable natural person.
- Special Category Personal Data: Data revealing racial or ethnic origin, political opinions, religious beliefs, health data, biometric and genetic data, and sexual life.
- Processing: Any operation performed on personal data.
- Data Subject: The natural person whose personal data is processed.
- Data Controller: AlphaPlus.
- Data Processor: Natural or legal persons processing data on behalf of AlphaPlus.
- Explicit Consent: Freely given, informed, specific and unambiguous consent.
- Anonymization: Irreversible removal of elements that can identify a person.
- VERBİS: Data Controllers' Registry Information System.
- GDPR: General Data Protection Regulation (EU) 2016/679.

3. Core Data Protection Principles

Alpha Plus processes personal data in accordance with the following principles (GDPR Article 5 – KVKK Article 4):

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimization
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

 ALPHA PLUS LIGATIO METALLICA	PERSONAL DATA PROTECTION POLICY	Doküman No	PLT009
		İlk Yayın Tarihi	27.07.2025
		Gözden Geçirme Tarihi	05.01.2026
		Revizyon Tarihi	
		Revizyon No	
		Sayfa No	2/5

4. Legal Bases for Processing Personal Data

Personal data is processed only where at least one legal basis applies.

4.1 Legal Bases under GDPR (Article 6)

- Explicit consent
- Performance of a contract
- Legal obligation
- Protection of vital interests
- Performance of a task carried out in the public interest
- Legitimate interests (subject to a balancing test)

4.2 Legal Bases under KVKK

- Explicit consent
- Explicitly provided for by laws
- Necessity for performance of a contract
- Legal obligation
- Legitimate interest, provided that fundamental rights are not harmed

5. Processing Special Category Personal Data

Special category personal data is processed only:

- With explicit consent; or
- Where permitted by law

Enhanced technical and administrative measures are applied, including restricted access and confidentiality obligations.

6. Data Retention and Disposal

Personal data is retained only for:

- The period required by law; or
- The period necessary for the purposes of processing

Upon expiry, data is deleted, destroyed or anonymized in accordance with AlphaPlus retention procedures.

7. Rights of Data Subjects

Alpha Plus fully respects data subject rights.

 ALPHA PLUS LIGATIO METALLICA	PERSONAL DATA PROTECTION POLICY	Doküman No	PLT009
		İlk Yayın Tarihi	27.07.2025
		Gözden Geçirme Tarihi	05.01.2026
		Revizyon Tarihi	
		Revizyon No	
		Sayfa No	3/5

7.1 Rights under KVKK

- Right to information
- Right of access
- Right to rectification
- Right to erasure or destruction
- Right to object
- Right to compensation

7.2 Additional Rights under GDPR

- Right to data portability (Article 20)
- Right to restriction of processing (Article 18)
- Right to withdraw consent at any time
- Right to object to automated decision-making and profiling (Article 22)

Requests are handled within statutory timelines.

8. Data Transfers

8.1 Domestic Transfers

Personal data may be transferred domestically only where lawful, necessary and secure.

8.2 International Transfers (GDPR Articles 44–49)

Cross-border transfers are carried out using one or more of the following mechanisms:

- EU adequacy decisions
- Standard Contractual Clauses (SCCs)
- Explicit consent (where applicable)
- Other lawful transfer mechanisms

9. Data Security Measures

Alpha Plus implements appropriate technical and administrative measures to:

- Prevent unauthorized access
- Protect against data breaches
- Ensure data integrity and confidentiality
- Maintain secure IT systems

 ALPHA PLUS LIGATIO METALLICA	PERSONAL DATA PROTECTION POLICY	Doküman No	PLT009
		İlk Yayın Tarihi	27.07.2025
		Gözden Geçirme Tarihi	05.01.2026
		Revizyon Tarihi	
		Revizyon No	
		Sayfa No	4/5

10. Personal Data Breach Management

In the event of a personal data breach:

- Where required, notification is made to the competent authority within 72 hours
- In high-risk cases, affected data subjects are informed
- Breaches are documented and remediated (GDPR Articles 33–34)

11. Data Protection Governance

Alpha Plus ensures accountability through:

- Appointment of a Data Protection Contact Point
- Clear internal responsibilities
- Ongoing compliance monitoring

12. VERBİS Obligations

Alpha Plus fulfils its obligations as Data Controller by:

- Registering with VERBİS where required
- Keeping registry information up to date
- Notifying changes within statutory periods

13. Training and Awareness

Alpha Plus provides regular training for:

- Employees
- Management
- Relevant business partners

Training records are retained.

14. Non-Compliance and Sanctions

Violation of this policy may result in:

- Disciplinary action
- Termination of contracts
- Legal and administrative sanctions

 ALPHA PLUS LIGATIO METALLICA	PERSONAL DATA PROTECTION POLICY	Doküman No	PLT009
		İlk Yayın Tarihi	27.07.2025
		Gözden Geçirme Tarihi	05.01.2026
		Revizyon Tarihi	
		Revizyon No	
		Sayfa No	5/5

15. Policy Review and Updates

This policy is reviewed at least annually and updated in line with:

- Legislative changes
- Regulatory guidance
- Operational developments

16. Conclusion

Alpha Plus reaffirms its commitment to protect personal data in accordance with KVKK, GDPR and the RJC Code of Practices 2024. Protecting personal data is a key component of Alpha Plus's ethical, transparent and responsible business conduct.

APPROVED BY THE GENERAL MANAGER AND THE BOARD OF DIRECTORS.

Alfa Metal Alaşım San. ve Tic. Ltd. Şti.



ALFA METAL ALAŞIM
San. ve Tic. Ltd. Şti.
Yenibosna Merkez Mah. Kuyumcular Sok.
No:4 İstanbul Vizyon Park Merkez Plaza
C1 Blok Kat:4/0420 Bahçelievler/İST.
Yenibosna V.D. 051 021 4942
Ticaret Sicil No: 619857

APPROVED BY THE GENERAL MANAGER AND THE BOARD OF DIRECTORS.