



Scope: Modeling and Design Of Jewelry with Gold and Silver Precious Metals Production, Sale and Export

1. Purpose and Scope

This Personal Data Protection and Privacy Policy ("Policy") forms an integral part of the Milan Jewellery Code of Ethics and sets out the principles governing the lawful, fair, transparent, and secure processing of personal data.

Milan Jewellery is committed to full compliance with:

- **Law on the Protection of Personal Data No. 6698 (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 Milan Jewellery processes 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 Categories of 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:** Milan Jewellery.
- **Data Processor:** Natural or legal persons processing data on behalf of Milan Jewellery.
- **Explicit Consent:** Freely given, informed, specific, and unambiguous consent.
- **Anonymization:** Irreversible removal of identifiable elements.
- **VERBIS:** Data Controllers Registry Information System.
- **GDPR:** General Data Protection Regulation (EU) 2016/679.

3. Fundamental Data Protection Principles

Milan Jewellery processes personal data in accordance with:

1. **Lawfulness, Fairness, and Transparency**
2. **Purpose Limitation**
3. **Data Minimization**
4. **Accuracy**
5. **Storage Limitation**
6. **Integrity and Confidentiality**
7. **Accountability**

(GDPR Article 5 – KVKK Article 4)

4. Legal Bases for Processing Personal Data

Personal data is processed only when at least one legal basis exists.

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 interest (subject to balancing test)

4.2 Legal Bases under KVKK

- Explicit consent
- Explicit provision by law



- Necessity for performance of a contract
- Legal obligation
- Legitimate interest, provided fundamental rights are not harmed

5. Processing of Special Categories of Personal Data

Special categories of personal data are processed only:

- With **explicit consent**, or
- Where permitted by law

Enhanced technical and administrative safeguards 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 duration necessary for processing purposes

Upon expiration, data is **deleted, destroyed, or anonymized** in accordance with Milan Jewellery's retention procedures.

7. Rights of Data Subjects

Milan Jewellery fully respects data subject rights.

7.1 Rights under KVKK

- Right to be informed
- Right of access
- Right to rectification
- Right to deletion or destruction
- Right to object
- Right to compensation

7.2 Additional Rights under GDPR

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

Requests are handled within statutory time limits.

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

Milan Jewellery implements appropriate technical and administrative measures to:

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

10. Personal Data Breach Management

In the event of a personal data breach:

- The relevant authority is notified **within 72 hours** where required
- Affected data subjects are informed where there is a high risk
- Breaches are documented and remediated

(GDPR Articles 33–34)

11. Data Protection Governance

Milan Jewellery ensures accountability through:

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

Data Protection Contact:

privacy@milanjewellery.com

12. VERBİS Obligations

Milan Jewellery fulfills its obligations as a Data Controller by:

- Registering with VERBİS where required
- Keeping registry information up to date
- Reporting changes within legal timeframes

13. Training and Awareness

Milan Jewellery provides regular training to:

- Employees
- Management
- Relevant business partners

Training records are maintained.

14. Non-Compliance and Sanctions

Violations of this Policy may result in:

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

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

Milan Jewellery affirms its commitment to protecting personal data in accordance with **KVKK, GDPR, and RJC Code of Practices 2024**. Personal data protection is a core component of Milan Jewellery's ethical, transparent, and responsible business conduct.

APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

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