

Website Privacy Policy

GNR GROUP® (“GNR GROUP”, the “Company”, “we”, “us” or “our”) respects privacy, information security and the responsible handling of personal data.

This Website Privacy Policy explains the categories of information that may be processed when you visit our website, interact with its content, contact us or use functionality made available through the website; the purposes for which such information may be used; the circumstances in which it may be shared; and the principles by which we seek to protect it.

This Policy describes the general privacy framework applicable to the GNR GROUP® corporate website.

Activity-specific privacy notices required under applicable data protection legislation, including Türkiye's Personal Data Protection Law No. 6698 where applicable, are provided separately when required.

1. Scope

This Policy applies to the GNR GROUP® corporate website and the corporate information, product and service information, communication facilities, technical materials, downloadable documents and other digital content made available through it.

Limited information may be processed in connection with: • visits to the website; • interaction with pages and content; • contact or quotation enquiries; • email correspondence with us; • recruitment or career-related communications, where available; • cookies and comparable technologies; • website security systems; • server and application logs; • traffic and performance measurement; • technical infrastructure supplied by third-party service providers.

This Policy does not govern third-party websites that may be linked from our website and are not operated by GNR GROUP®.

2. Information We May Process

Depending upon how the website is used, the following categories of information may be processed.

Technical and Usage Information When the website is accessed, limited technical information may be processed automatically, including: • IP address; • approximate location inferred from an IP address; • browser type and version; • device type; • operating system; • display and language settings; • referring website or search engine; • pages accessed; • date and time of access; • session and usage information; • link and click information; • error logs; • security events; • cookie or comparable technical identifiers; • general traffic and usage statistics.

Such information is primarily used to operate, protect and evaluate the performance of the website and to diagnose technical issues.

3. Information Provided Through Communications

When you contact us by email, contact form or another communication channel, we may process information that you voluntarily provide, including: • name and surname; • company or organisation; • position or professional title; • email address; • telephone number; • the content of your communication; • product, project or quotation information; • files or attachments submitted by you; • other information reasonably required in connection with the correspondence.

We encourage you to provide only information that is necessary for your request.

4. Customer, Supplier and Business Relationship Information

Where you contact us in connection with an existing or prospective business relationship, we may process: • company or organisational information; • business contact information; • authorised representative or contact-person information; • product or service enquiries; • quotations and project information; • technical requirements; • procurement or supply information; • business correspondence.

Such information may be used to evaluate requests, establish or administer business relationships and maintain appropriate corporate communications.

5. Recruitment Information

Where recruitment or career functionality is made available through the website, information voluntarily provided by candidates may include: • identity and contact information; • curriculum vitae; • education; • employment history; • language skills and professional qualifications; • information relating to the position applied for; • other professional information submitted by the candidate.

Applicants are encouraged not to include sensitive personal data that are not necessary for the recruitment process.

6. Purposes for Which Information May Be Used

Depending upon its nature, information may be used: • to operate and maintain the website; • to provide corporate information; • to respond to enquiries; • to manage customer and supplier communications; • to evaluate quotation and project requests; • to administer recruitment processes; • to assess website performance; • to diagnose technical issues; • to improve user experience; • to maintain information and system security; • to prevent spam, abuse, fraud and cyberattacks; • to comply with legal obligations; • to protect the Company's rights and legitimate interests; • to manage legal disputes; • to support audit and compliance processes where necessary.

Personal data are not intended to be used in a manner incompatible with the purposes for which they were obtained.

7. Legal Bases

Processing may rely upon one or more lawful bases available under applicable legislation.

Depending upon the particular activity, these may include: • compliance with legal obligations; • performance of a contract; • taking steps at the request of an individual before entering into a contract; • legitimate interests pursued by GNR GROUP®; • establishment, exercise or protection of legal rights; • consent where consent is legally required.

More specific information may be provided separately where a particular processing activity requires it.

8. Cookies and Similar Technologies

Our website may use: • strictly necessary cookies; • functionality cookies; • performance technologies; • analytics tools; • security technologies.

Where the use of non-essential cookies requires consent, those technologies should be activated in accordance with the user's preferences.

Cookie preferences may, where available, be managed through a consent interface or browser settings.

Blocking certain cookies may affect particular website functions.

9. Analytics and Performance Measurement

Limited analytics information may be processed to understand how the website is used.

This may assist us in understanding: • commonly accessed pages; • traffic sources; • general visitor trends; • website performance; • technical errors; • general navigation patterns.

Where reasonably practicable, we favour the use of aggregated or pseudonymised analytics information.

10. Security Monitoring and Technical Logs

Technical and security records may be maintained to protect the GNR GROUP® website and associated systems.

Such records may be used for: • detecting unauthorised access attempts; • blocking malicious traffic or automation; • preventing attacks and abuse; • identifying system errors; • incident response; • information-security investigations.

Security records are not maintained for the purpose of creating advertising profiles.

11. No Sale of Personal Data

GNR GROUP® does not sell personal data to data brokers, advertisers or other third parties for commercial purposes.

We do not provide personal data to third parties for their independent marketing activities.

12. Service Providers and Disclosure of Information

Limited information may be disclosed, where necessary, to trusted service providers supporting the operation of our website or our business.

Such providers may include: • hosting and infrastructure providers; • domain and DNS providers; • cybersecurity providers; • analytics and performance providers; • email and corporate communications providers; • information-technology and maintenance providers; • professional advisers; • legal, audit and compliance advisers.

Any such disclosure should remain proportionate to the relevant purpose and reasonably necessary.

Information may also be disclosed where required by law, pursuant to a lawful request from a competent authority, or where necessary to establish, exercise or protect the legal rights of GNR GROUP®.

13. International Data Transfers

Because modern information technology infrastructure is global, certain service providers may operate or process technical information in jurisdictions other than the country from which the website is accessed.

Where personal data are transferred internationally, applicable data protection requirements and legally required transfer mechanisms or safeguards are taken into consideration.

14. Data Minimisation

We seek to process only information that is relevant, appropriate and reasonably necessary for the applicable purpose.

We aim not to request personal information from users or business partners where such information is not required.

15. Data Retention

Personal and technical information should not be retained for longer than reasonably required for its legitimate purpose.

Retention periods may vary according to: • the nature of the information; • the purpose of processing; • legal requirements; • contractual obligations; • applicable limitation or dispute periods; • security requirements.

When information is no longer required, it may be deleted, destroyed, anonymised or lawfully archived in accordance with applicable requirements and Company procedures.

16. Information Security

GNR GROUP® supports technical and organisational safeguards proportionate to risk in order to protect information against unauthorised access, loss, misuse, alteration or disclosure.

Depending upon the circumstances, safeguards may include: • encrypted connections; • access controls; • authentication mechanisms; • network and application security; • restrictions on user privileges; • security logging; • backups; • incident monitoring; • system and software updates.

No method of electronic transmission or storage can, however, provide an absolute guarantee of security.

17. Confidential and Sensitive Information

Users are encouraged not to submit sensitive or confidential information through email or website forms unless it is necessary for the relevant request.

Sensitive categories of personal data should be supplied only where necessary, lawful and subject to appropriate safeguards.

18. Children's Privacy

The GNR GROUP® corporate website is not designed as a service directed at children.

We do not seek knowingly and systematically to collect personal information from children through the website.

19. Automated Decision-Making

Unless expressly stated otherwise, information collected through the website is not used to make solely automated decisions producing legal or similarly significant effects upon individuals.

20. External Links

Our website may contain links to third-party websites or digital services.

Such services may be outside the control of GNR GROUP® and subject to their own privacy practices.

GNR GROUP® is not responsible for the independent data-processing practices of third-party services.

21. Privacy Rights

Depending upon the law applicable to the relevant processing activity, individuals may have rights to: • request information about personal data; • obtain access to personal data; • request correction of inaccurate information; • request deletion or destruction where the legal conditions are satisfied; • object to certain processing activities; • withdraw consent where processing is based upon consent; • exercise other rights provided under applicable legislation.

The scope and method of exercising those rights may differ according to the governing law.

Detailed rights and application procedures under Türkiye's Personal Data Protection Law are addressed separately in the relevant privacy notices and application documents.

22. Corporate Communications

Where you contact us, your contact details and correspondence may be processed to respond to your request, maintain appropriate business records, administer an existing or prospective business relationship and protect legal rights.

Because electronic communications cannot be guaranteed to be absolutely secure, we recommend that highly sensitive or unnecessary confidential information not be transmitted by ordinary email.

23. Marketing Communications

Where electronic marketing or commercial communications are undertaken, applicable consent and preference requirements are taken into consideration.

The fact that an individual has contacted GNR GROUP® does not, by itself, constitute consent to receive marketing communications.

24. Relationship Between This Policy and Specific Privacy Notices

This Policy explains GNR GROUP®'s general approach to privacy across its website and digital channels.

Where applicable legislation requires specific information to be provided in relation to a particular processing activity or category of individuals, such information is provided separately.

This Policy is therefore not intended to replace activity-specific privacy notices required under applicable data protection legislation.

25. Changes to This Policy

GNR GROUP® may update this Policy from time to time to reflect changes in: • legislation; • website functionality; • technology; • service providers; • security requirements; • Company practices.

The current version will be made available through the website.

26. Contact

For questions concerning this Privacy Policy or the processing of information through the GNR GROUP® website, please contact: GNR GROUP® Email: info@gnrgroup.com Please provide sufficient information for us to understand and appropriately address your request.

GNR GROUP® Privacy Principle

Our approach is to avoid collecting more personal data than necessary, use information only for legitimate purposes, protect it appropriately and manage it under a demonstrable framework of responsibility.