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PRIVACY STATEMENT

Demir Deniz Group

Version 2026.1, effective 19 November 2026

This Privacy Statement explains which personal data Demir Deniz Group processes, why, on what legal basis, for how long and which rights you have.

1. WHO WE ARE

1.1 This Privacy Statement explains how Demir Deniz Group ("DDG", "we", "us" or "our") processes personal data. It applies to clients and their contact persons, counterparties and other parties involved in our engagements, people who contact us by email, telephone or otherwise, and visitors to the DDG website.

1.2 Demir Deniz Group operates through the following two entities. The entity that is the contracting party in an engagement is the controller for the personal data processed in that engagement:

	Demir Deniz Group (the Netherlands)	Nedcon Group (Türkiye)
Registered name	Demir Deniz, trading as Demir Deniz Group	Nedcon Group Yapı Malzemeleri İç ve Dış Ticaret Danışmanlık Limited Şirketi, trading as Demir Deniz Group
Registration	Netherlands Chamber of Commerce (KvK) No. 82584702	Kayseri Trade Registry No. 63401; MERSİS No. 0630140705900001
VAT	VAT No. NL003702160B36	As stated on the invoice
Address	Weesperstraat 107, 1018 VN Amsterdam, the Netherlands (headquarters)	Alsancak Mah. 217. Sk. No: 25, Kocasinan, Kayseri, Türkiye

1.3 If no engagement exists, or if it is unclear which entity is the controller, you can contact us at global@demirdeniz.com. We will tell you which entity processes your data.

1.4 This Privacy Statement forms part of the DDG Terms of Service, available at www.demirdeniz.com/terms.pdf. In case of conflict on the processing of personal data, this Privacy Statement prevails.

2. WHICH PERSONAL DATA WE PROCESS

2.1 Depending on our relationship with you, we process the following categories of personal data:

(a) identification and contact data, such as name, title, position, company, address, email address and telephone number;

(b) verification and compliance data, such as a copy of an identity document, date and place of birth, nationality, information on ultimate

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beneficial owners, information on politically exposed persons and the results of sanctions screening;

(c) engagement data, such as instructions, correspondence, documents, notes of meetings and calls, and the advice and other work we deliver;

(d) financial data, such as invoices, payments, bank account details and, where relevant for an engagement, information on financial capacity;

(e) communication data, such as the content and metadata of emails, text and WhatsApp messages; and

(f) technical data of website visitors, such as IP address, browser type and the date and time of a visit.

2.2 We do not ask for special categories of personal data, such as data on health, religion or criminal records, unless this is necessary for an engagement and permitted by law. If you send us such data on your own initiative, we only use it to the extent necessary for the engagement.

2.3 We obtain personal data from you, from the organisation you work for, from parties involved in an engagement and from public sources, such as commercial registers, the Turkish Trade Registry Gazette, sanctions lists, official publications and the websites of the companies concerned.

3. PURPOSES AND LEGAL BASES

3.1 We process personal data for the following purposes and on the following legal bases under article 6(1) of the General Data Protection Regulation (EU) 2016/679 ("GDPR") and article 5 of Turkish Law No. 6698 on the Protection of Personal Data ("KVKK"):

(a) to handle requests and to conclude and perform engagements, including advice, research, due diligence, correspondence and the introduction of parties: performance of a contract or steps prior to a contract;

(b) to identify and verify clients, ultimate beneficial owners and counterparties, to screen for sanctions and to keep our records: compliance with legal obligations, such as obligations under anti-money laundering, sanctions and tax laws;

(c) to invoice, to collect amounts due and to keep our accounts: performance of a contract and compliance with legal obligations;

(d) to check counterparties, to prevent fraud and misuse, to secure our systems and to establish, exercise or defend legal claims: our legitimate interests;

(e) to maintain business relationships and to send relevant professional information to business contacts: our legitimate interests, and consent where the law requires it; and

(f) to operate and secure the DDG website: our legitimate interests.

3.2 Where we rely on legitimate interests, we have weighed those interests against your interests and rights. You may object to such processing at any time (see clause 8).

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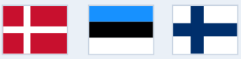








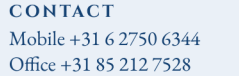


3.3 Where we rely on consent, you may withdraw it at any time. This does not affect the lawfulness of processing before the withdrawal.

3.4 If you do not provide the personal data that we need to verify your identity or to comply with our legal obligations, we cannot accept or continue the engagement.

4. WHO RECEIVES PERSONAL DATA

4.1 We share personal data only where this is necessary for the purposes in clause 3, with:

(a) members of the DDG team who work on the engagement, who are bound by confidentiality;

(b) third parties engaged for an engagement, such as local partners, sworn translators and experts;

(c) counterparties and other parties involved in an engagement, to the extent necessary for the engagement;

(d) service providers who support our business, such as providers of email, hosting, cloud storage and IT services, and our accountants and tax advisers;

(e) banks and payment service providers for payments; and

(f) courts, supervisory authorities, tax authorities and other public authorities, where we are legally obliged to do so, including reports to FIU-Nederland under the Dutch Anti-Money Laundering and Anti-Terrorist Financing Act (Wwft).

4.2 Service providers who process personal data on our behalf do so under a data processing agreement and only on our instructions.

4.3 We do not sell personal data.

5. INTERNATIONAL TRANSFERS

5.1 Because we advise across borders, personal data may be transferred between the Netherlands, Türkiye and other countries where an engagement requires it, including countries outside the European Economic Area.

5.2 Where personal data is transferred from the European Economic Area to a country without an adequacy decision of the European Commission, we use appropriate safeguards under article 46 GDPR, such as the standard contractual clauses of the European Commission. In specific cases a transfer may be based on article 49 GDPR, for example where the transfer is necessary for the performance of an engagement at your request.

5.3 Transfers of personal data from Türkiye take place in accordance with article 9 KVKK.

5.4 You can request further information on the safeguards used by contacting us at global@demirdeniz.com.

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6. RETENTION

6.1 We keep personal data no longer than necessary for the purposes for which it was collected, unless a longer period is required by law. We apply the following periods:

(a) engagement files and correspondence: seven (7) years after the end of the engagement;

(b) financial records and invoices: seven (7) years, as required by Dutch tax law (article 52 of the General Tax Act, AWR);

(c) documents and data used for client due diligence under the Wwft: five (5) years after the end of the business relationship or after the transaction, as required by article 33 Wwft;

(d) contact data of business contacts without an engagement: two (2) years after the last contact; and

(e) technical data of website visitors: no longer than necessary to operate and secure the website.

6.2 We may keep personal data longer where this is necessary to establish, exercise or defend legal claims, or where a longer period is required by Turkish or other applicable law. After the retention period, we delete or anonymise the data.

7. SECURITY

7.1 We take appropriate technical and organisational measures to protect personal data against loss, unauthorised access and misuse, such as access restrictions, secure passwords, encrypted connections and confidentiality obligations for everyone who works for DDG.

7.2 If a personal data breach occurs that is likely to result in a risk to your rights, we notify the competent supervisory authority and, where required, inform you without undue delay.

8. YOUR RIGHTS

8.1 Under the GDPR you have the right to:

(a) access your personal data;

(b) have incorrect or incomplete data corrected;

(c) have your data erased;

(d) have the processing restricted;

(e) receive your data in a structured, commonly used and machine-readable format and have it transferred to another party (data portability);

(f) object to processing based on legitimate interests and to direct marketing; and

(g) withdraw your consent at any time, where processing is based on consent.

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8.2 If your data is processed by Nedcon Group (Türkiye), you also have the rights set out in article 11 KVKK.

8.3 You can exercise your rights by email to global@demirdeniz.com. We may ask you to verify your identity. We respond within one month. Where the request is complex or where we receive many requests, this period may be extended by two further months, in which case we inform you within the first month.

8.4 Some rights are limited by law. For example, we cannot erase data that we must keep under the Wwft or tax law, and the law may prohibit us from informing you about a report made to FIU-Nederland.

9. AUTOMATED DECISIONS

9.1 We do not take decisions based solely on automated processing, including profiling, that produce legal effects concerning you or similarly significantly affect you.

10. WEBSITE AND COOKIES

10.1 The DDG website may use functional cookies that are necessary for the website to work. Where other cookies are used, such as analytical or tracking cookies, we ask for your consent first where the law requires it.

11. QUESTIONS AND COMPLAINTS

11.1 If you have questions about this Privacy Statement or about the processing of your personal data, please contact us at global@demirdeniz.com.

11.2 If you have a complaint, please send it to klachten@demirdeniz.com. We respond within fourteen (14) days.

11.3 You also have the right to lodge a complaint with a supervisory authority. In the Netherlands this is the Dutch Data Protection Authority (Autoriteit Persoonsgegevens, www.autoriteitpersoonsgegevens.nl). In Türkiye this is the Personal Data Protection Authority (Kişisel Verileri Koruma Kurumu, www.kvkk.gov.tr).

12. CHANGES

12.1 We may amend this Privacy Statement. The current version is published at www.demirdeniz.com/privacy.pdf and is available on request. This version replaces all earlier versions.

12.2 This Privacy Statement is drawn up in English. A translation is for reference only, and the English text prevails in case of inconsistency.

Demir Deniz Group
Amsterdam, 19 November 2026
International Consulting & Advisory | Cross-Border Structuring | Legal Advice

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