

## INFORMATION NOTICE ON THE PROTECTION OF PERSONAL DATA

This Information and Clarification Form has been prepared within the scope of the processing and transfer of "Personal Data" of natural persons as regulated by the Personal Data Protection Law No. 6698 ("KVK Law"). Within the scope of Law No. 6698, all kinds of current information belonging to you that you share with our company will be considered "Personal Data". The security of your personal data is of great importance to us, and your personal data will be stored in accordance with the conditions stipulated by the legislation, in the most secure manner possible, and for the duration required by legal obligations.

### Data Controller and Representative

Pursuant to the Personal Data Protection Law No. 6698 ("KVK Law"), your personal data may be processed by MAARİFA as the "Data Controller" within the scope explained below.

### Your Processed Personal Data

**Identity:** Name, Surname, Mother's and Father's Name, Date of Birth, Place of Birth, Marital Status, ID Card Serial Number, Turkish ID Number, Passport Number, Temporary Turkish ID Number, Gender Information, Turkish ID Card, Driver's License

**Contact:** Address, Email Address, Contact Address, Phone Number

**Personnel:** Payroll Information, Disciplinary Investigation, Employment Entry-Exit Records, Resume Information, Performance Evaluation Reports, Military Service Status

**Legal Process:** Information in correspondence with judicial authorities, information in case files, etc.

**Customer Transaction:** Invoice, Bill, Check Information, Order Information, Appointment Information, Request Information

**Physical Space Security:** Employee Entry-Exit Record Information

**Resume Information:** Performance Evaluation Reports, Military Service Status

**Visitor Entry-Exit Record Information:** Closed Circuit Camera System Footage, IP Camera Transaction Security, Transaction Security (IP address information, website login-logout information, password and passcode information)

**Risk Management:** Information processed for managing commercial, technical, and administrative risks

**Finance:** Balance Sheet Information, Financial Performance Information, Credit and Risk Information, Bank Account Number, IBAN Number

**Professional Experience:** Diploma Information, Attended Courses, In-service Training Information, Certificates, Last Worked Company Information, References

**Visual and Audio Records:** Camera Recordings, Photographs, Association Membership, Association membership information, etc.

**Health Information:** Information on Disability Status, Blood Type Information, Personal Health Information, Used Devices and Prostheses Information, Laboratory and Imaging Results, Test Results, Examination Data

**Criminal Convictions and Security Measures:** Information related to criminal convictions

**Family Information:** Number of Children, Spouse's Employment Information, Children's Education and Age Information, Birth and Death Certificate, Employment Data, Branch-Department, Employment Type, Profession, Professional Card Information

**Website Usage Data:** Date of Filling Application Form, IP Address, Request/Complaint Management Information, Personal data regarding any request or complaint directed to the Company.

**Reputation Management Information:** Information collected to protect the Company's commercial reputation and related evaluation reports and actions taken.

**Event Management Information:** Personal data processed for taking necessary legal, technical, and administrative measures against events to protect the Company's commercial rights and interests and its customers' rights and interests.

**Signatures:** Wet or electronic signatures, fingerprints, special marks on documents containing personal data

**Insurance Information:** Automatic Enrollment in BES, Social Security Institution Data

**Vehicle Information:** Vehicle license plate, brand, model, model year, engine chassis number, license registration date, license copy, no-claim information

**Compliance Information:** Personal data processed within the scope of compliance with policies

**Audit and Inspection Information:** Personal data processed during internal or external audit activities

### **Personal Data Processing Purposes:**

Execution of Emergency Management Processes

Execution of Information Security Processes

Execution of Employee Candidate/Intern/Student Selection and Placement Processes

Execution of Application Processes of Employee Candidates

Fulfillment of Obligations Arising from Employment Contracts and Legislation for Employees

Execution of Benefits and Interests Processes for Employees

Execution of Audit/Ethics Activities

Execution of Training Activities

Execution of Access Authorities

Execution of Activities in Compliance with Legislation

Execution of Finance and Accounting Works

Execution of Loyalty Processes to the Company/Product/Service

Ensuring the Security of Physical Spaces

Execution of Assignment Processes

Monitoring and Execution of Legal Affairs

Execution of Internal Audit/Investigation/Intelligence Activities

Execution of Communication Activities

Planning of Human Resources Processes

Execution/Inspection of Business Activities

Execution of Occupational Health and Safety Activities

Collection and Evaluation of Suggestions for Improvement of Business Processes

Execution of Business Continuity Activities

Execution of Logistics Activities

Execution of Goods/Services Procurement Processes

Execution of Post-Sales Support Services of Goods/Services

Execution of Goods/Services Sales Processes

Execution of Goods/Services Production and Operation Processes

Execution of Customer Relationship Management Processes

Execution of Activities Aimed at Customer Satisfaction

Organization and Event Management

Execution of Marketing Analysis Studies

Execution of Performance Evaluation Processes

Execution of Risk Management Processes

Execution of Storage and Archive Activities

Execution of Strategic Planning Activities

Follow-up of Requests/Complaints

Ensuring the Security of Movable Property and Resources

Execution of Supply Chain Management Processes

Execution of Wage Policy

Execution of Marketing Processes of Products/Services

Ensuring the Security of Data Controller Operations

Execution of Investment Processes

Execution of Talent/Career Development Activities

Providing Information to Authorized Persons, Institutions, and Organizations

Execution of Management Activities

Creation and Follow-up of Visitor Records

### **Recipients and Purposes of Personal Data Transfer**

MAARIFA, in accordance with Articles 8 and 9 of the Law, may transfer personal data belonging to the employee candidate, employee, shareholder/partner, potential product or service buyer, intern, supplier employee, supplier official, product or service buyer, visitor, family member, and relative to the following categories of persons:

### **Persons Who Can Be Transferred Data & Description and Scope of Data Transfer Purpose**

Natural persons or private law legal entities: Natural or legal persons with whom MAARIFA has relations and conducts transactions, limited to the work and transaction performed.

**Business Partners:** Business partners with whom MAARİFA is in relation for purposes such as promotion and marketing of its products and services, after-sales support, limited to the purpose and activities of the partnership.

**Affiliates:** Legal or natural persons with whom MAARİFA has established partnership relations, limited to the commercial activities of MAARİFA and to the extent necessary for planning, execution, and supervision.

**Authorized Public Institutions and Organizations:** Public institutions and organizations authorized to request information and documents from MAARİFA in accordance with the provisions of relevant legislation, such as the Social Security Institution, Tax Offices, etc., limited to the purpose requested by the relevant public institutions and organizations within their legal authority.

**Contracted service providers and collaborating organizations:** Organizations established in accordance with the relevant legislation and continuing their activities within this framework, from whom contracted services are received and with whom collaborations are made, limited to the subjects related to their field of activity under the contract and cooperation protocol.

## **Transfer of Data Abroad**

Your personal data may be transferred by MAARİFA to persons and organizations established in foreign countries with sufficient protection, as determined and announced by the Personal Data Protection Board ("Board"), or in cases where adequate protection is not determined and announced, only to foreign countries where data controllers in Turkey and the relevant foreign country have committed to providing adequate protection in writing and obtained the Board's permission for the relevant transfer, provided that your explicit consent is obtained in light of the principles stipulated in Article 4/2 of the KVKK, or in the presence of the situations specified in Articles 5/2 and 6/3 without obtaining your explicit consent, and in accordance with the rules stipulated in Article 9 of the Law.

## **Legal Grounds**

Your personal data may be processed in relation to, but not limited to, the following laws, if explicitly stipulated and/or foreseen by the laws, to fulfill our legal obligations:

- Tax Procedure Law No. 213
- Turkish Commercial Code No. 6102
- Turkish Code of Obligations No. 6098
- Labor Law No. 4857
- Occupational Health and Safety Law No. 6331
- Social Insurance and General Health Insurance Law No. 5510
- Turkish Penal Code No. 5237

- Personal Data Protection Law No. 6698
- Law No. 5651 on Regulating Broadcasting in the Internet and Fighting Against Crimes Committed through Internet Broadcasting
- Your explicit consent and our legitimate interests.

## **Processing of Special Categories of Personal Data**

Your personal data, which is considered as special categories of personal data as per the Personal Data Protection Law No. 6698 and related regulations (race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, dress and appearance, association, foundation or trade union membership, health information, sexual life, criminal conviction and security measures, biometric and genetic data) will be processed under the conditions stipulated in the relevant legislation or with your explicit consent.

## **Exceptions Foreseen by the Law**

In cases where the processing of personal data belonging to the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract, it is mandatory for the controller to fulfill its legal obligation, it is mandatory for the establishment, exercise, or protection of any right, the processing of personal data is necessary for the legitimate interests pursued by the controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject, and in other procedures and principles specified in the relevant legislation, your personal data may be processed without your explicit consent.

## **Your Rights as a Personal Data Subject**

As personal data subjects, if you submit your requests regarding your rights to our Company by the methods set out below, our Company will conclude the request free of charge as soon as possible and within thirty days at the latest, depending on the nature of the request. However, if a fee is stipulated by the Personal Data Protection Board, the fee determined in the tariff set by our Company will be charged. Within this scope, personal data subjects have the right to:

- Learn whether personal data is processed or not,
- Request information if personal data has been processed,
- Learn the purpose of processing personal data and whether they are used in accordance with its purpose,
- Know the third parties to whom personal data is transferred within the country or abroad,
- Request correction of personal data if it is incomplete or incorrectly processed and request notification of the process carried out within this scope to third parties to whom personal data is transferred,

- Request deletion or destruction of personal data in case the reasons requiring its processing cease to exist, despite being processed in accordance with the KVKK and other relevant laws, and request notification of the process carried out within this scope to third parties to whom personal data is transferred,
- Object to the occurrence of a result against the person by analyzing the processed data exclusively through automated systems,
- Demand compensation for the damages in case of suffering loss due to the illegal processing of personal data.

To use the above-mentioned rights, you can send your request, including the necessary information to identify your identity and your explanations about your right you want to use among the rights specified in Article 11 of the KVKK Law, via email to [kvkk@maarifa.com.tr](mailto:kvkk@maarifa.com.tr) or by applying in person to the address Universiteler Mah. 1606. Cad. A-Blok Apt. No:4 A/606 Cankaya/Ankara.

Our company reserves the right to make changes to this information notice due to possible changes in the KVKK Law and the methods to be determined by the Personal Data Protection Board.