

**KiralikYonetimi.com**

# **PERSONAL DATA PROTECTION AND PROCESSING POLICY**

**Target Audience:** All real persons whose personal data are processed by Aytaç MESTÇİ

**Prepared by:** Aytaç MESTÇİ and his staff

**Version 1.**

**Approved by:** Data Controller Aytaç MESTÇİ.

**KiralikYonetimi.com**  
**PERSONAL DATA PROTECTION AND PROCESSING POLICY**

## **1. ENTRY**

**Aytaç MESTÇİ**("Individual Company " / "Company") is rental property management consultancy firm that stands out with its detailed services in the field of property management. In particular, it provides comprehensive services related to the management of properties purchased in Turkey by Turkish citizens living abroad and foreigners living in Turkey.

**The Company** attaches importance to the protection of personal data in its activities and considers it among its priorities in its business and transactions. **The Company's** Personal Data Protection and Processing Policy ("**Policy**") is the basic regulation for the compliance of the **Company's organization and business processes** with the personal data processing procedures and principles determined by **the Personal Data Protection Law No. 6698** ("**Law**"). In line with the principles of this Policy, **the Company** processes and protects personal data with a high level of responsibility and awareness, and provides the necessary transparency by informing personal data owners.

### ***1.1. Purpose***

The purpose of this Policy is to ensure that the procedures and principles stipulated by the Law and other relevant legislation are harmonized with the **Company's** organization and processes and implemented effectively in its activities. **The Company** takes all kinds of administrative and technical measures for the processing and protection of personal data with this Policy, establishes the necessary internal procedures, raises awareness, and conducts all necessary trainings to ensure awareness. All necessary measures are taken and appropriate and effective audit mechanisms are established for the compliance of shareholders, officers, employees and business partners with the Law processes.

### ***1.2. Scope***

The Policy covers all personal data obtained by automatic means in the **Company's** business processes or by non-automatic means, provided that they are part of any data recording system.

### ***1.3. Basis***

The Policy is based on the Law and relevant legislation. Personal data are processed in order to fulfill legal obligations arising from Public Procurement Law No. 4734, State Procurement Law No. 2886, Identity Notification Law No. 1774, Labor Law No. 4857, Occupational Health and Safety Law No. 6331, Social Security and General Health Insurance Law No. 5510,

Unemployment Insurance Law No. 4447, Turkish Commercial Code No. 6102, Tax Procedure Law No. 213 and other relevant legislation.

In cases of incompatibility between the applicable legislation and the Policy, the applicable legislation shall apply. The regulations stipulated by the relevant legislation are transformed into **Company** practices through the Policy.

#### ***1.4. Definitions***

<b>Explicit Consent</b>	It refers to consent on a specific subject, based on information and expressed with free will.
<b>Application Form</b>	The application form for the applications to be made by the relevant person (Personal Data Owner) to the data controller, prepared in accordance with the Law No. 6698 on the Protection of Personal Data and the Communiqué on the Procedures and Principles of Application to the Data Controller issued by the Personal Data Protection Authority, which includes the application to be made by personal data owners to exercise their rights.
<b>Related User</b>	The persons who process personal data within the organization of the data controller or in accordance with the authorization and instruction received from the data controller, except the person or unit responsible for the storage, protection and backup of the data technically.
<b>Disposal</b>	Deletion, destruction or anonymization of personal data.
<b>Recording Medium</b>	Any environment in which personal data are processed, which are fully or partially in automated ways or non-automated ways provided that being part of any data recording system.
<b>Personal Data</b>	Any information relating to an identified or identifiable natural person.
<b>Processing of Personal Data</b>	Any operation performed on personal data such as obtaining, recording, storing, preserving, modifying, reorganizing, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or by non-automatic means provided that it is part of any data recording system.
<b>Anonymization of Personal Data</b>	Making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even by matching with other data.
<b>Personal Data Owner</b>	The natural person whose personal data is processed by or on behalf of the Company.

<b>Deletion of Personal Data</b>	Deletion of personal data is the process of making personal data inaccessible and unusable for the relevant users in no way.
<b>Destruction of Personal Data</b>	The process of rendering personal data inaccessible, unrecoverable and unusable by anyone in no way.
<b>Board</b>	Personal Data Protection Board
<b>Institution</b>	Personal Data Protection Institution
<b>Sensitive Personal Data</b>	It means personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership of associations, foundations or trade-unions, information relating to health, sexual life, convictions and security measures, and the biometric and genetic data.
<b>Periodic Destruction</b>	In the event that all of the conditions for processing personal data specified in the Law disappear, the deletion, destruction or anonymization process to be carried out ex officio at recurring intervals specified in the personal data storage and destruction policy.
<b>Data Processor</b>	A natural or legal person who processes personal data on behalf of the data controller based on the authorization granted by the data controller.
<b>Data Registration System</b>	A recording system where personal data is structured and processed according to certain criteria.
<b>Data Subject/ Related Person</b>	The natural person whose personal data is processed.
<b>Data Controller</b>	The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.
<b>Data Representative</b>	A natural person appointed to fulfill the duties of the Data Controller within the scope of the relevant articles of the Law.
<b>Regulation</b>	Regulation on Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette on October 28, 2017.

## 2. PROTECTION OF PERSONAL DATA

### 2.1. Ensuring Security of Personal Data

**The Company** takes the necessary measures stipulated in Article 12 of the Law, depending on the nature of the personal data, to prevent unlawful disclosure, access, transfer or other security problems that may arise in other ways. **The Company** takes measures and conducts audits to ensure the required level of personal data security in accordance with the guidelines published by the Personal Data Protection Authority.

### 2.2. Protection of Sensitive Personal Data

Measures taken for the protection of data on race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions, security measures and biometric and genetic data of individuals, which are of a private nature, are carefully implemented and necessary audits are carried out.

### ***2.3. Improving Consciousness on the Protection and Processing of Personal Data***

**The Company** provides the necessary trainings to those concerned in order to ensure that personal data is processed and accessed in accordance with the law, and to raise awareness about the protection of data and the exercise of rights.

In order to increase employees' awareness of personal data protection, **the Company** establishes the necessary business processes and receives support from consultants if needed. Deficiencies encountered in practice and the results of trainings are evaluated by **the Company** management. New trainings are organized in case of need based on these evaluations and changes in the relevant legislation.

## **3. Processing of Personal Data**

### ***3.1. Processing of Personal Data in accordance with the Legislation***

Personal data is processed in accordance with the legislation in line with the principles listed below.

**i. Personal data is processed in accordance with the legislation in line with the principles listed below.**

Personal data are processed to the extent required by business processes, limited to these, without harming the fundamental rights and freedoms of individuals, in accordance with the law and the rule of honesty.

**ii. Ensuring that Personal Data is Up-to-Date and Accurate**

Necessary measures are taken to keep the processed personal data up-to-date and accurate and work in a planned and programmed manner.

**iii. Processing with Specific, Explicit and Legitimate Purposes**

Personal data are processed depending on the legitimate purposes determined and explained in the business processes carried out.

**iv. Being Related, Limited and Proportional to Purpose of Data Processing**

Personal data are collected to the quality and extent required by business processes, and processed in a limited manner for the specified purposes.

**v. Retention for as long as necessary**

Personal data is retained for the minimum period stipulated in the relevant legislation and required for the purpose of processing personal data. First of all, if a period of time is stipulated in the relevant legislation for the storage of personal data, it is kept for this period, and if not, personal data are kept for the period required for the purpose for which they are processed. At the end of the retention periods, personal data are destroyed by appropriate methods (deletion, destruction or anonymization) in accordance with periodic destruction periods or data subject application.

***Terms and Conditions of Processing Personal Data***

Personal data is processed based on the explicit consent of the owner or on one or more other conditions specified below.

**i. Explicit Consent of Personal Data Subject**

Processing of personal data is done with the explicit consent of the data owner. The explicit consent of the personal data subject is realized by informing him/her on a specific subject and obtaining his/her free will.

**ii. Lack of Explicit Consent of the Personal Data Owner**

Personal data may be processed without the explicit consent of the data subject if any of the conditions listed below are present.

**a. Explicit Regulation of Laws**

In the event that there is a clear regulation on the processing of personal data in the laws, personal data may be processed without the consent of the data subject.

**b. Failure to Obtain Explicit Consent of the Person Due to Actual Impossibility**

The personal data of the data subject may be processed if it is mandatory to process the personal data of the person who is unable to disclose his consent due to actual impossibility or whose consent cannot be recognized as valid, in order to protect his or another person's life or physical integrity.

**c. Direct Relevance to the Establishment or Performance of the Contract**

If the processing of personal data is directly related to the conclusion or performance of a contract to which the data subject is a party, the personal data of the data subject may be processed.

**d. Fulfillment of Legal Obligation**

While the **Company** fulfills its legal obligations, the personal data of the data subject may be processed if personal data processing is mandatory.

**e. Publicization of Personal Data by the Personal Data Owner**

Personal data belonging to data subjects who publicize their personal data may be processed limited to the purpose of publicization.

**f. Mandatory Data Processing for the Establishment or Protection of a Right**

The personal data of the data subject may be processed if data processing is mandatory for the establishment, exercise or protection of a right.

**g. Mandatory Data Processing for Legitimate Interest**

Provided that it does not harm the fundamental rights and freedoms of the personal data owner, the personal data of the data owner may be processed if data processing is mandatory for the legitimate interests of **the Company**.

**3.3. Processing of Special Categories of Personal Data**

**The Company** processes special categories of personal data in accordance with the principles set out in the Law and the Policy, by taking all necessary administrative and technical measures with the methods determined by the Board, in accordance with the following procedures and principles:

- i. **Sensitive personal data other than health and sexual life** can be processed without seeking the explicit consent of the data subject, if there is an explicit provision in the law regarding the processing. Explicit consent of the data subject is obtained in cases not explicitly stipulated in the laws.
- ii. **Sensitive personal data relating to health and sexual life** may be processed by persons under the obligation of confidentiality or authorized institutions and organizations: for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, without seeking the explicit consent of the data owner. Otherwise, the explicit consent of the data owner is obtained.

**3.4. Informing the Personal Data Owner**

**The Company** informs personal data subjects in accordance with the relevant legislation on the purposes for which their personal data are processed, for which purposes they are shared with whom, by which methods they are collected, the legal reason and the rights of data subjects in the processing of their personal data. In this respect, the protection of personal data is carried out in accordance with other policy documents and clarification texts prepared within the framework of the principles in the Policy.

**3.5. Transferring Personal Data**

**The Company** may transfer personal data and sensitive personal data to third parties (third party companies, group companies, third real persons) in accordance with the law by taking the necessary security measures in line with the purposes of personal data processing. **The Company** shall carry out the transfer transactions in accordance with the regulations stipulated in the 8th article of the Law.

#### **i. Transferring Personal Data**

Although the explicit consent of the personal data owner is required for the transfer of personal data, personal data may be transferred to third parties based on one or more of the following conditions, by taking all necessary security measures, including the methods stipulated by the Board.

- a. Explicitly stipulated in the law,
- b. It is directly related to and necessary for the conclusion or performance of a contract,
- c. It is mandatory for **the Company** to fulfill its legal obligations,
- d. Limited to the purpose of publicization, provided that the personal data has been made public by the data owner,
- e. It is mandatory for the establishment, use or protection of the rights of **the Company** or the data subject or third parties,
- f. It is mandatory for the legitimate interests of **the Company**, provided that it does not harm the fundamental rights and freedoms of the data subject,
- g. It is necessary for the protection of the life or bodily integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid.

Personal data related to any of the above-mentioned situations may be transferred to foreign countries declared as "**Foreign Countries with Adequate Protection**", which are determined to have adequate protection by the Board. Personal data may be transferred to data controllers in Turkey and foreign countries, where there is no adequate protection, who undertake adequate protection in writing and where the Board has the permission of the "**Foreign Country Where the Data Controller Undertakes Adequate Protection**" status, according to the conditions stipulated in the legislation.

#### **ii. Transfer of Sensitive Personal Data**

Sensitive personal data may be transferred under the conditions set out below by taking **all necessary administrative and technical measures, including the methods to be determined by the Board, in accordance with the principles set out in the Policy:**

- a. **Sensitive personal data other than health and sexual life**, without seeking the explicit consent of the data subject in case there is an explicit provision in the laws regarding the processing of personal data, otherwise, in case the explicit consent of the data subject is obtained.
- b. **Sensitive personal data related to health and sexual life**, for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, by persons or authorized institutions and organizations under the obligation of confidentiality, without seeking explicit consent, otherwise, if the explicit consent of the data subject is obtained.

Personal data may be transferred to those in the **status of "Foreign Country with Adequate Protection"** in the presence of any of the above conditions, and in the absence of adequate protection, **personal data** may be transferred to those in the **status of "Foreign Country where the Data Controller Committed to Adequate Protection"** according to the data transfer conditions regulated in the legislation.



#### 4. PERSONAL DATA INVENTORY PARAMETERS

Data categories and personal data (**Annex-1**) of personal data owners consisting of general manager, administrative and financial affairs, personnel, accounting, manufacturing assembly, sales and marketing, warehouse, business preparation, purchasing, IT business processes, employee candidate, employee, shareholder/partner, potential product or service buyer, intern, supplier representative, product or service recipient, parent/guardian/representative, visitors are processed depending on the purposes of personal data processing (**Annex-2**). The purposes of processing according to data categories and the details of the data subject groups are notified in the Company area at <https://verbis.kvkk.gov.tr/>.

The purposes of personal data processing are processed according to the categories of personal data, in accordance with Article 10th of the Law and other legislation, to inform the relevant persons, based on and limited to at least one of the personal data processing conditions specified in Articles 5 and 6 of the Law, in accordance with the general principles specified in the Law, in particular the principles specified in Article 4 of the Law regarding the processing of personal data.

Personal data are transferred in accordance with the principles set out in the section "3.5 Natural persons or private legal entities, shareholders, business partners, affiliates and subsidiaries, suppliers, authorized public institutions and organizations, private insurance companies, auditors, consultants, contracted services, domestic organizations that we cooperate with, for the purposes specified in the section "Transfer of Personal Data" (**Annex-3**). There is no data transfer to foreign countries.

#### 5. MEASURES TAKEN REGARDING THE PROTECTION OF PERSONAL DATA

**The Company** takes the necessary technical and administrative measures for the protection of personal data that it processes in accordance with the procedures and principles set out in the Law, conducts the necessary audits in this context, and carries out awareness-raising and training activities.

Although all technical and administrative measures have been taken, in the event that the processed personal data is illegally obtained by third parties, **the Company** shall notify the relevant persons and units as soon as possible.

#### 6. STORAGE AND DESTRUCTION OF PERSONAL DATA

**The Company** retains personal data for the period required for the purpose of processing and for the minimum period stipulated in the relevant legislation. First of all, if a period is determined in the relevant legislation, **the Company** stores personal data in accordance with this period; If no legal period is stipulated, it stores personal data for the period required for the purpose of processing personal data. Personal data shall be destroyed at the end of the specified retention periods, in accordance with the periodic destruction periods or the data subject application, by the specified method (deletion, destruction or anonymization).

## **7. RIGHTS OF PERSONAL DATA SUBJECTS AND USE OF THESE RIGHTS**

### ***7.1. Rights of the Personal Data Owner***

Personal data subjects have the following rights arising from the Law:

- i.** Learn whether personal data is being processed,
- ii.** Request information if their personal data has been processed,
- iii.** to learn the purpose of processing personal data and whether they are used in line with their purpose,
- iv.** To know the third parties to whom personal data are transferred domestically or abroad,
- v.** To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- vi.** Although it has been processed in accordance with the provisions of the Law and other relevant laws, to request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- vii.** To object to the emergence of a result to the disadvantage of the person himself/herself by analyzing the processed data exclusively through automated systems,
- viii.** In case of damage due to unlawful processing of personal data, to demand compensation for the damage.

### ***7.2. Exercising the Rights of the Personal Data Owner***

Personal data owners may submit their requests regarding the rights listed in Article 6.1. to **the Company** by the methods determined by the Board. Personal data owners and those who have the right to apply on their behalf may apply to **the Company** by filling out the "Data Owner Application Form" (**Annex-4**).

### ***7.3. Responding to Applications by the Company***

**The Company** finalizes the applications made by the personal data owner in accordance with the Law and other legislation. Requests duly submitted to **the Company** shall be finalized free of charge as soon as possible and within 30 (thirty) days at the latest. However, if the transaction requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board.

### ***7.4. Rejection of the Application of the Personal Data Owner***

**The Company** may reject the request of the applicant in the following cases by explaining its reasoning:

- i.** Processing of personal data for purposes such as research, planning and statistics by anonymizing them with official statistics,
- ii.** Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that such processing does not violate national

- defense, national security, public security, public order, economic security, privacy or personal rights or constitute a crime,
- iii. Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order or economic security,
  - iv. Processing of personal data by judicial or enforcement authorities in relation to investigations, prosecutions, trials or executions,
  - v. Processing of personal data is necessary for the prevention of crime or criminal investigation,
  - vi. Processing of personal data made public by the personal data subject himself/herself,
  - vii. Personal data processing is necessary for the execution of supervisory or regulatory duties and disciplinary investigation or prosecution by the authorized and authorized public institutions and organizations and professional organizations in the nature of public institutions based on the authority granted by the Law,
  - viii. Processing of personal data is necessary for the protection of the economic and financial interests of the State in relation to budgetary, tax and fiscal matters,
  - ix. The request of the personal data subject is likely to impede the rights and freedoms of other persons,
  - x. Demands were made that required excessive effort,
  - xi. The requested information is public information.

#### ***7.5. Personal Data Subject's Right to Complaint to the PDPB (KVKK) (PERSONAL DATA PROTECTION AUTHORITY)***

Pursuant to Article 14 of the Law, in cases where the application is rejected, the response is deemed insufficient or the application is not responded to in due time, the applicant may file a complaint to the Board within thirty days from the date of learning **the Company's** response and in any case within sixty days from the date of application.

#### ***7.6. Information to be Requested from the Applicant Personal Data Owner***

**The Company** may request information from the relevant person to determine whether the applicant is the owner of personal data. In order to clarify the issues in the application of the personal data owner, **the Company** may ask the personal data owner questions about the application.

## **8. EXECUTION**

The Policy has been approved and put into effect by the Board of Directors. The technical execution of the Policy is provided by the "Personal Data Storage and Destruction Policy" (Annex-5).

In business processes, execution of the Policy before the parties "**Customer Clarification Text and Explicit Consent Declaration**" (Annex-6), "**Employee Clarification Text and Explicit Consent Declaration**" (Annex-7), "**Employee Candidate Clarification Text and Explicit Consent Declaration**" (Annex-8), "**Website Cookie Clarification Text**" (Annex-9). The **Company** is responsible for the execution of the Law and the Policy and updating it when necessary, and for the follow-up, coordination and supervision of all business and transactions within this scope.

## **9. EFFECTIVE AND PUBLICATION**

The policy has entered into force as of the date of its publication. Any amendments to the Policy shall be published on the Company's website ([www.kiralikyonetimi.com](http://www.kiralikyonetimi.com)) and made accessible to personal data owners and relevant persons. Policy changes become effective on the date they are announced.

## **ANNEXES**

**Annex 1- Categories of Data and Personal Data**

**Annex 2 - Purposes of Processing Personal Data**

**Annex 3- Persons to whom Personal Data is Transferred and Purposes of Transfer**

**Annex 4- Personal Data Owner Application Form**

**Annex 5- Personal Data Storage and Destruction Policy**

**Annex 6- Personal Data Processing Customer Clarification Text**

**Annex 7- Employee Clarification Text and Explicit Consent Declaration**

**Annex 8- Employee Candidate Clarification Text and Explicit Consent Declaration**

**Annex 10- Website Cookie Clarification Text**

## Annex 1 - Data Categories and Personal Data

Categories of data	Personal Data
<b>Identity</b>	Name Surname
	Name of the mother & father
	Date of Birth
	Place of Birth
	Marital Status
	Identity Card Serial No:
	TR Identity No
	Gender Information
	TR Identity Card
<b>Contact</b>	Address
	E-mail Address
	Contact Address
	Registered electronic mail address (KEP): [*]
	Telephone No
<b>Compendiousness</b>	Payroll Information
	Disciplinary Investigation
	Records of Employment Entry-Exit Document
	Resume Information
<b>Legal Action</b>	Information in correspondence with judicial authorities, information in the case file, etc.
<b>Customer Transaction</b>	Invoice
	Input-Output Information
	Appointment Information
<b>• Physical Space Security</b>	Entry-Exit Registration Information of Employees and Visitors
<b>Risk Management</b>	Information processed to manage commercial, technical, administrative risks
<b>Finance</b>	Bank Account Number
	IBAN Number
<b>Professional Experience</b>	Diploma Information
	Courses Attended
	In-service Training Information
	Certificates
<b>Marketing</b>	Cookie Records
<b>Health Information</b>	Disability Information
	Blood Type Information
	Personal Health Information
	Device and Prosthesis Information Used
	Laboratory and Imaging Results
	Test Results
	Inspection Data

	Prescription Details
<b>Criminal Conviction and Security Measures</b>	Information on Criminal Conviction
	Information on Safety Precaution
<b>Family Information</b>	Number of Children
	Family Registry
	Co-working Information
	Child Education and Age Information
<b>Professional experience</b>	Department
	Work Type
	Profession
	Reference Information
	Last Company Information
<b>Website Usage Data</b>	Application Form Filling Date
<b>Request/Complaint Management Information</b>	Survey data Personal data regarding the receipt and evaluation of any request or complaint addressed to the Company
<b>Reputation Management Information</b>	Information collected for the purpose of protecting the Company's commercial reputation and information about the evaluation reports and actions taken.
<b>Incident Management Information</b>	Personal data processed in order to take the necessary legal, technical and administrative measures against the events that develop in order to protect the commercial rights and interests of the Company and the rights and interests of its customers.
<b>Signature Information</b>	Wet or electronic signatures, fingerprints, special marks on documents that are personal data
<b>Insurance Information</b>	Private Insurance Data
	Social Security Institution Data
<b>Harmonics</b>	Personal data processed within the scope of compliance with policies
<b>Audit and Inspection Information</b>	Personal data processed during internal or external audit activities

## Annex 2 - Categorical Personal Data Processing Purposes

Conducting Emergency Management Processes
Execution of Information Security Processes
Execution of Employee Candidate / Intern / Student Selection and Placement Processes
Execution of the Application Process of Employee Candidates
Execution of Employee Satisfaction and Loyalty Processes
Employee Contract and Fulfillment of Obligations Arising From Legislation
Execution of Employee Benefits and Side Benefits Processes
Conducting Audit / Ethics Activities
Conducting Training Activities

Execution of Access Authorities
Conducting Activities in Compliance with Legislation
Execution of Finance and Accounting Affairs
Execution of Company / Product / Service Loyalty Processes
Ensuring Physical Space Security
Execution of Assignment Processes
Following Up and Conducting Legal Affairs
Conduct of Internal Audit/Investigation / Intelligence Activities
Conducting Communication Activities
Planning of Human Resources Processes
Execution / Supervision of Business Activities
Execution of Occupational Health / Safety Activities
Receiving and Evaluating Suggestions for Improvement of Business Processes
Providing Business Continuity Activities
Execution of Logistics Activities
Execution of Goods / Service Procurement Processes
Execution of Goods / Services After Sales Support Services
Execution of Goods / Service Sales Processes
Execution of Goods / Service Production and Operation Processes
Execution of Customer Relationship Management Processes
Conducting Activities for Customer Satisfaction
Organization and Event Management
Execution of Performance Evaluation Processes
Execution of Advertising / Campaign / Promotion Processes
Execution of Risk Management Processes
Execution of Storage and Archive Activities
Execution of Contract Processes
Tracking of Requests / Complaints
Ensuring the Security of Movable Property and Resources,
Execution of Wage Policy
Execution of Marketing Processes of Products / Services,
Ensuring the Security of Data Controller Operations
Execution of Talent / Career Development Activities
Providing Information to Authorized Persons, Institutions and Organizations
Execution of Management Activities,
Creating and Following up Visitor Logs
Business Partners, Planning and Management of Access Powers of Suppliers to Information and Facilities
Management of Relations with Business Partners and/or Suppliers
Collecting Entry Exit Records of Partner/Supplier Employees
Planning and Management of Alignment of Activities to Relevant Legislation or Company Procedures

### Annex 3- Persons to whom Personal Data is Transferred and Purposes of Transfer

In accordance with Articles 8 and 9 of the Law, the Company may transfer the personal data of its participants, customers and employees to the categories of persons listed below:

Persons to whom Data Transfer can be made	Definition	Purpose and Scope of Data Transfer
<b>Real persons or private legal entities</b>	Real persons or legal entities with whom the Company has a relationship due to its activities and with whom it	Restricted to the work and transaction performed
<b>Shareholders</b>	Real persons who have established a partnership with the company	Limited for the purpose of planning, executing and auditing strategies related to the Company's business activities
<b>Business Partners</b>	Business partners, business partner banks with whom the Company has relations for purposes such as the promotion and marketing of the Company's products and services and	Establishment and execution of business partnership limited to its purpose and activities
<b>Legally Authorized Public Institutions and Organizations</b>	Public institutions and organizations authorized to receive information and documents from the Company in accordance with the provisions of the relevant legislation such as Social Security Institution, Tax Offices, etc.	Limited to the purpose requested by the relevant public institutions and organizations subject to their legal authority
<b>Legally Authorized Private Persons</b>	Institutions or organizations established in accordance with certain conditions in accordance with the provisions Institutions or organizations established in accordance with certain conditions in	Limited to the subjects falling within the fields of activity they carry out
<b>Customer</b>	Real or legal persons who benefit or will benefit from the goods and services offered by the Company	Limited to product and service sales and marketing
<b>Organizations that receive contracted services and cooperate</b>	Organizations that receive contracted services and cooperate	Limited to the principles of the contract and cooperation protocol
<b>Attorneys</b>	Lawyers authorized as attorneys in accordance with the relevant legislation	The company is limited to the issues that may have legal consequences in its activities and worker transactions
<b>Supplier</b>	Parties providing services in line with the Company's data processing purposes and requests	Limited to the supply of goods and services to fulfill the Company's commercial activities from outsourcing
<b>Insurance Companies</b>	Contracted PPS (Individual Retirement System) Company	Limited to the notification made within the scope of the
<b>Supervisors</b>	Auditors authorized to audit in accordance with the relevant legislation	Authorities and duty limits specified in the legislation