

## **Data Controller and Representative**

According to the Law on the Protection of Personal Data No. 6698 ("Law No. 6698"), the Data Controller is **Idenfit Information Services Industry and Foreign Trade Inc.**

## **Principles Regarding the Processing of Personal Data of Our Business Partners:**

**As Idenfit Information Services Industry and Foreign Trade Inc.:**

- a) We are committed to processing data in accordance with legal and ethical standards.
- b) We make efforts to ensure the accuracy and currency of the data.
- c) Data is processed for specific, clear, and legitimate purposes.
- ç) Data processing is limited, proportionate, and connected to the purposes for which they were collected.
- d) We adhere to the principle of retaining data for the duration prescribed by the legislation or as long as necessary for the purpose for which it was processed."

## **Information and Scope**

"In the course of our activities as Idenfit, we process the personal data, both special and general, of our employees/employee candidates and interns in accordance with the data processing conditions specified in Articles 5 and 6 of the Law on the Protection of Personal Data No. 6698. This processing is carried out within the limits of necessity, considering our legitimate interests, company principles, and obligations as a data controller, such as establishing rights, protection, usage, and legal responsibilities as per contracts.

With this awareness, we attach great importance to the processing (storage, deletion, destruction, backup, etc.) of special and general personal data of employees working within the Idenfit organization and those who apply for employment, in compliance with the Law on the Protection of Personal Data No. 6698, secondary regulations (regulations, communiques, guidelines) issued in connection with the Law, and decisions taken and to be taken by the Personal Data Protection Board, which are binding in nature."

## **Processed Personal Data**

Personal Data Processed for Job Application, Recruitment, and Subsequent Work Processes for Employees or Employee Candidates:

Various personal data may be processed for individuals applying for a job, during the recruitment process, and throughout subsequent work processes. Some of the personal data that may be processed for employees or employee candidates include:

**Identity Information:**All identity information, nationality, marital status, place, and date of birth, Turkish ID number, gender, signature information, Social Security Institution (SGK) number, etc.

**Contact Information:**Phone number, backup person's phone information for emergency contact, address information, email address, etc.

**Education Information:**Educational background, information about courses and seminars attended, language proficiency, training received during the professional career, diploma information, resume details, etc.

**Financial Information:**Financial and salary details, bonus list, execution follow-up and debt information, bank details, information about minimum living allowance, etc.

**Visual Data:**Photographs, camera recording images.

**Biometric Data:**Fingerprint data.

**Location Data:**Location information.

**Special Category of Personal Data:**Disability status, health reports, health declaration document, pregnancy information, occupational disease records, pre-employment medical examination form, daily health complaints and records, blood type information, criminal record, information related to legal proceedings, religion information from the old version of ID card, etc. Special category personal data is processed only with explicit consent.

**Work Data:**Employee ID, job title, department and unit, position, date of the last hiring, dates of joining and leaving, insurance entry/retirement, social security number, flexible working hours, travel status, number of working days, projects worked on, monthly total overtime information, seniority compensation base date, seniority compensation additional day, days spent on strike, employee internet and company internal access logs, etc.

**Leave Data:**Leave seniority base date, leave seniority additional day, leave group, exit/return date, days, reason for leave.

Other: Military service status, vehicle plate, performance information, family notification, and parent information.

### **Processing Purpose of Your Personal Data**

Your collected personal data, which you have disclosed to us through your job application request, will be processed for the purposes of evaluating your job application and suitability for the relevant position, conducting and concluding recruitment processes within the framework of our company's human resources policies, establishing communication with you, and ensuring legal and commercial obligations with parties in business relations with our company. Additionally, your personal data will be processed for purposes such as determining and implementing commercial and business strategies, developing and improving the recruitment principles applied by our company, and fulfilling legal obligations under laws such as the Labor Law, Social Security Legislation, Turkish Commercial Code, Turkish Code of Obligations, Occupational Health and Safety, and Tax Legislation, within the conditions and purposes of personal data processing stipulated in Articles 5 and 6 of Law No. 6698.

### **Transfer of Processed Personal Data and to Whom and for What Purpose**

Your collected personal data as Idenfit may be transferred by our business units, for the purpose of planning and executing our company's human resources policies and processes, and ensuring the fulfillment of activities performed by our company in compliance with relevant legislation and company procedures. The transfer will be limited to the purposes of carrying out necessary operational activities to responsible legal entities, business partners, company officials, relevant parties to customers as required by business operations, suppliers (insurance companies, financial institutions, catering, vehicle leasing, operator companies), employees, legally authorized public institutions, and private individuals, in accordance with the purposes specified in Articles 5 and 6 of Law No. 6698.

### **Method and Legal Basis of Personal Data Collection**

Your personal data is collected through direct or indirect means, such as email, our company's website allowing you to apply for a job, other third-party websites, or in physical form, utilizing your resume, application form, and personality inventory form, based on the legal reasons specified in the information and scope section above.

The personal data collected under the specified legal reasons and within the scope of the Turkish Labor Law No. 4857 is processed in accordance with the personal data processing conditions and purposes specified in Articles 5 and 6 of Law No. 6698. This processing is carried out within the framework of our

legitimate interests and the company principles we adopt, and is subject to our legal responsibility as the data controller. It also complies with data controller obligations such as establishing, protecting, and using rights, as well as fulfilling contractual obligations. The personal data collected under the Turkish Labor Law No. 4857 is processed due to legal obligations arising from laws such as the Turkish Commercial Code No. 6102, Social Security Legislation, Turkish Code of Obligations No. 6098, Occupational Health and Safety, and Tax Legislation, as well as other related legislation.

### **Rights of the Personal Data Owner as Stated in Article 11 of Law No. 6698**

As personal data owners, if you communicate your requests regarding your rights to our company through the methods outlined in the Idenfit Information Text, our company will respond to your request, depending on its nature, within a maximum of thirty days, free of charge. However, if a fee is envisaged by the Personal Data Protection Board, our company will charge the fee specified in the tariff determined by the Personal Data Protection Board. In this context, personal data owners have the following rights:

- Learning whether personal data is being processed,
- Requesting information if personal data has been processed,
- Learning the purpose of the processing of personal data and whether they are used in accordance with their purpose,
- Knowing the third parties to whom personal data are transferred, whether domestically or abroad,
- Requesting the correction of personal data in case of incomplete or incorrect processing and, within this scope, requesting that the transaction be notified to the third parties to whom the personal data has been transferred,
- Requesting the deletion or destruction of personal data in case the reasons requiring their processing disappear, despite being processed in accordance with Law No. 6698 and other related legal provisions, and requesting that the transaction be notified to the third parties to whom the personal data has been transferred,
- Objecting to the emergence of a result against the individual by exclusively analyzing the processed data through automated systems,
- If personal data is processed unlawfully and causes harm, having the right to request the elimination of the damage.

### **How We Protect Your Personal Data?**

All personal data collected by Idenfit is subject to necessary technical and administrative measures to ensure security. In this regard, we take physical, technical, organizational, and managerial measures to prevent unauthorized access, misuse, disclosure, or alteration of personal data, in accordance with the requirements of the Personal Data Security Guide published by the Personal Data Protection Authority (KVKK), ISO/IEC 27001 Information Security, ISO/IEC

27701 Privacy Information Management standards, and in compliance with the General Data Protection Regulation (GDPR) of the European Union.

### **How Can You Exercise Your Rights Regarding Personal Data?**

In accordance with Article 13, Paragraph 1 of the Law on the Protection of Personal Data, you can exercise your rights by submitting your request to use the rights mentioned above. You can make your request using the following methods and information, based on the "Communiqué on Application Procedures and Principles for Data Controllers," published on March 10, 2018, with the serial number 30356.

Required information in the application:

1. Name and surname of the applicant.
2. If the applicant is a Turkish citizen, the Turkish ID number; if not, the passport number along with nationality.
3. Residential or business address of the applicant for notification.
4. Electronic mail address, phone, or fax number for notification.
5. Subject of the request.
6. Information and documents regarding the subject of the request.

### **Methods of Application for Data Subjects:**

The data subject can personally deliver a sealed envelope containing the 'Application Form' filled out to the Idenfit address, with a written note on the envelope stating 'Information Request According to the Law on the Protection of Personal Data,' along with a protocol record.

The data subject can send a notification to Idenfit through a notary, but the notification envelope must include the notation 'Information Request According to the Law on the Protection of Personal Data.'

The data subject, using the 'Secure Electronic Signature' defined in the Law No. 5070 on Electronic Signature, can personally apply to our company through the Registered Electronic Mail at [idenfitbilisim@hs01.kep.tr](mailto:idenfitbilisim@hs01.kep.tr) and also to the email address [kvk-komite@idenfit.com](mailto:kvk-komite@idenfit.com), designated only for this matter, with the subject 'Information Request According to the Law on the Protection of Personal Data.'

You can access our application form for the rights mentioned above from here.

## **How Long Does It Take to Respond to Your Requests Regarding the Processing of Your Personal Data?**

Requests for rights regarding your personal data will be evaluated, and a response will be provided within a maximum of 30 (thirty) days from the date they reach us. In case of a negative evaluation of your application, the reasons for rejection will be sent to the address you specified in the application via email or post.

### **Changes in Our Privacy Notice:**

If we make changes to our privacy notice, we will publish the revised notice here along with the updated revision date. In case of significant changes that substantially alter our privacy practices, we may inform you before the changes take effect through methods such as sending an email or posting a notification on our corporate website and/or social media accounts.

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