

THE KOÇ SCHOOL
POLICY ON THE PROTECTION AND PROCESSING OF THE PERSONAL DATA OF
EMPLOYEES

OCTOBER 7, 2016

**THE KOÇ SCHOOL (VKV KOÇ ÖZEL İLKOKULU, ORTAOKULU VE LİSESİ)
POLICY OF PROTECTION AND PROCESSING OF THE PERSONAL DATA OF
EMPLOYEES
INFORMATION FORM**

Name of the Document:

The Koç School Policy of Protection and Processing of the Personal Data of Employees

Target Group:

All real persons whose personal data is being processed by the Koç School

Prepared By:

The Koç School

Version:

2.0

Approved by:

The Koç School Central Administrative Committee (CAC) has approved it.

Date of Effect:

October 7, 2016

In case there is a conflict between the version prepared in Turkish and its translation, the Turkish version will prevail.

© The Koç School, 2016

This document herein shall not be copied and distributed without the written permission of the Koç School.

CONTENTS

- INTRODUCTION..... 5**
- THE PURPOSE OF THE POLICY 6**
- THE SCOPE OF THE POLICY 6**
- ENFORCEMENT AND UPDATABILITY..... 6**
- 1 PRINCIPLES ON PROCESSING THE PERSONAL DATA OF THE EMPLOYEES 6**
 - 1.1 Processing the Data in Accordance to the Law and Good Faith..... 6
 - 1.2 Providing the Personal Data to be Accurate and Up-to-Date When Necessary 7
 - 1.3 Processing with Specific, Open and Legitimate Purposes 7
 - 1.4 Being Measured, Connected and Limited to the Processing Purpose 7
 - 1.5 Keeping the Personal Data as long as Foreseen in the Regulation or Until They are Necessary for the Purpose of Their Process 7
- 2 CONDITIONS ON THE PROCESSING OF THE EMPLOYEES’ PERSONAL DATA .. 8**
 - 2.1 Processing the Personal Data of the Employee Based on Open Consent.... 8
 - 2.2 Situations Clearly Foreseen by the Law 8
 - 2.3 Being Unable to Get the Open Consent of the Employee Due to De Facto Impossibility..... 8
 - 2.4 Direct Relation with the Constitution or Execution of the Contract 9
 - 2.5 The Institution’s Fulfillment of the Legal Obligations 9
 - 2.6 The Employee’s Making His/Her Personal Data Public 9
 - 2.7 Obligation to Process Data for Establishment or Protection of a Right..... 9
 - 2.8 Data Processing Based on Legitimate Interest..... 9

- 3 CIRCUMSTANCES WHEN SPECIAL QUALITY PERSONAL DATA MAY BE PROCESSED 9
 - 3.1 Processing the Personal Data of a Private Nature Based on Explicit Consent
10
 - 3.2 Processing the Personal Data of a Private Nature Without an Explicit Consent..... 10
- 4 ELUCIDATION AND NOTIFICATION OF THE EMPLOYEE 10
- 5 CATEGORIZATION OF PERSONAL DATA 11
- 6 THE PURPOSES OF PROCESSING PERSONAL DATA..... 14

INTRODUCTION

PDP Law brings in important arrangements regarding the protection of personal data and processing them in accordance to the law.

Within the context of the related PDP Law, the personal data is described as all kinds of information about real persons with determined or determinable identities. Processing of personal data is explained as all the processes that are conducted in the time between the collection of the personal data and its deletion.

Protection of the personal data is a very sensitive issue for our Institution and it is one of the top priorities of our Institution. Protection of the personal data is a Constitutional Right. Our institution pays the necessary attention to protect the personal data of our students, candidate students, parents, graduates, visitors, third parties, candidate employees, institution's shareholders, institution's authorities, employees of the institutions we work in cooperation, their shareholders and authorities and these activities are managed by the Koç School Policy on the Protection and Processing of the Personal Data of Employees ("PDP Policy").

The activities our Institution conducts regarding the protection of the personal data of our Institution's employees ("Employee(s)"), are managed under this Policy on Protection and Processing of the Personal Data of the Koç School Employees ("Policy") drawn in parallel with the rudiments specified in the PDP Policy. Having the appropriate procedures in processing the personal data, our Institution will act in accordance to the law and this will have an impact on all related activities.

THE PURPOSE OF THE POLICY

This Policy hereby regulates the rules to be applied when processing the personal data of the Employees. Therefore, the purpose of this Policy is to determine how the personal data of the Employees will be processed. Another purpose of this Policy is to inform the Employees regarding the processing of their personal data.

THE SCOPE OF THE POLICY

This Policy includes the Employees of our Institution and finds a scope of application regarding the personal data of the Employees processed either automatically or non-automatically provided that they are a part of a data recording system.

ENFORCEMENT AND UPDATABILITY

This Policy will be updated from time to time in order to comply with the changing conditions and regulations. In case of an update, the Employees will be informed about the related update via e-mail or other channels.

1 PRINCIPLES ON PROCESSING THE PERSONAL DATA OF THE EMPLOYEES

1.1 Processing the Data in Accordance to the Law and Good Faith

In the processing of the personal data, the principles determined by the legal arrangements, rules on general trust and good faith are conducted. Within this context, the personal data will be processed in proportion to the purpose of the procedure and in a limited manner.

1.2 Providing the Personal Data to be Accurate and Up-to-Date When Necessary

Periodical controls and updates are made in order to maintain the accuracy and up-to-datedness of the data, considering the legitimate interests of the Employees and necessary precautions are taken in this direction. In this context, the systems towards controlling the accuracy of the personal data and making necessary amendments are made within the body of our Institution.

1.3 Processing with Specific, Open and Legitimate Purposes

Personal data are processed based on open and clear data processing purposes. Personal data are processed commensurately just for these purposes. The purpose of the data processing is revealed before the process begins.

1.4 Being Measured, Connected and Limited to the Processing Purpose

The personal data are eligibly processed in order to realize the determined purposes and the personal data not related to these purposes or that are unneeded should be avoided.

1.5 Keeping the Personal Data as long as Foreseen in the Regulation or Until They are Necessary for the Purpose of Their Process

Our Institution keeps the personal data as long as foreseen in the regulation or until they are necessary for the purpose of their process. In this scope, first the regulation is checked about whether a period is foreseen for these data to be kept, in case a period was determined, this period is applied; if not then the personal data are kept until they are necessary for the purpose of the process. In case the given period is over or the purpose of the process disappears and there are no legal reasons that permit to process them any further, the personal data are erased, destroyed or made anonymous in accordance to the principles of the policy our Institution applies.

2 CONDITIONS ON THE PROCESSING OF THE EMPLOYEES' PERSONAL DATA

The open consent of the owner of the personal data is one of the legal basis that make it possible to process the personal data in accordance to the law. In case there is no open consent, the personal data can be processed in the existence of one of the conditions stated below. The basis of processing the personal data can be one of the conditions below as well as more than one of these conditions together. In case the data that is being processed is personal data with special qualities; in addition to the rules written here, the conditions under the title "The Situations Where the Personal Data of Private Nature Can Be Processed" will apply.

2.1 Processing the Personal Data of the Employee Based on Open Consent

The personal data of the employees are processed based on open consent unless they are processed based on a different condition. The Employee is informed about which personal data will be processed, the reasons and aims in processing these personal data, from which resources these personal data are collected , to whom these personal data will be shared and how they will be used and the open consent of the employee is taken. The source of the collected data is taken into consideration when receiving the open consent and it is prepared peculiar to each data-collecting source.

2.2 Situations Clearly Foreseen by the Law

In situations where the law clearly foresees the processing of the personal data, our Institution processes the personal data of the Employee without open consent.

2.3 Being Unable to Get the Open Consent of the Employee Due to De Facto Impossibility

The personal data of the Employee who is unable to give open consent due to de facto impossibility or whose consent cannot be recognized as valid may be

processed by necessity in order to protect this Employee's or another person's life or body integrity without the open consent of the Employee.

2.4 Direct Relation with the Constitution or Execution of the Contract

Under the condition that the data is directly related to the constitution or execution of an agreement, the personal data can be processed if there is need to process personal data, which belongs to the parties of the agreement.

2.5 The Institution's Fulfillment of the Legal Obligations

The personal data of the Employee may be processed without explicit consent in order to fulfill the legal obligations as the data controller.

2.6 The Employee's Making His/Her Personal Data Public

In case the Employee makes his/her personal data public, the data may be processed without explicit consent.

2.7 Obligation to Process Data for Establishment or Protection of a Right

In order to establish or protect a right, the personal data of an Employee may be processed without explicit consent.

2.8 Data Processing Based on Legitimate Interest

Provided that the fundamental rights and freedoms of the Employee are not harmed, the personal data of the Employee may be processed when it is obligatory to process them for the legitimate interest of our Institution.

3 CIRCUMSTANCES WHEN PERSONAL DATA OF A PRIVATE NATURE MAY BE PROCESSED

Some of the personal data are arranged separately as "Personal Data of Private Nature" and are subject to special protection. Due to their risk to cause unjust

treatment or discrimination of individuals when processed against the law, these data have been given a special importance.

3.1 Processing the Personal Data of a Private Nature Based on Explicit Consent

The Personal Data of a Private Nature can be processed with the explicit consent of the Employee. Explicit consent can be taken according to the quality of the Personal Data of Private Nature using the principles stated in this Procedure and by taking the necessary administrative and technical precautions.

3.2 Processing the Personal Data of a Private Nature without an Explicit Consent

When there is no explicit consent of the Employee, Personal Data of a Private Nature can be processed with the condition to take the sufficient precautions that will be determined by the Personal Data Protection Council (“Council”) under the circumstances stated below:

- (i) In circumstances foreseen by the law in terms of Personal Data of Private Nature other than the Employee’s health and sexual life,
- (ii) Employee’s private personal data regarding his/her health and sexual life can only be transferred with the aims to protect public health, to practice preventive medicine, to make medical diagnosis, to carry out treatment and care services, to plan and manage health services and their finances; the data may be processed by people who are under the confidentiality obligation or authorized institutions and organizations.

4 ELUCIDATION AND NOTIFICATION OF THE EMPLOYEE

Our Institution notifies the personal data holders during the obtainment of the personal data. Within this scope, the ID of the Institution representative, if there is any, the purpose to process the personal data, with whom and with which purpose this data can be transferred, the method and lawful reason of collecting and the rights of the Employee are declared to the Employee.

In case the Employees require information regarding their personal data, our Institution gives the necessary information to them.

5 CATEGORIZATION OF PERSONAL DATA

Within this Policy herein, the personal data of the Employees under the below stated categories are processed by our Institution.

CATEGORIZATION OF PERSONAL DATA	CATEGORIZATION OF PERSONAL DATA EXPLANATION
Identity Information	These are the data regarding the identity of the individual where it is apparent that the identity is evident or it belongs to a real determinable person; processed partially or completely automatically or non-automatically as part of the data recording system; documents such as driving license, identity card or passport that includes information such as name-surname, TR identity number, nationality, parent’s names, place of birth, date of birth, gender and tax number, social security number, signature info, license plate of the vehicle etc.
Communication Information	These are the data regarding the identity of the individual where it is apparent that the identity is evident or it belongs to a real determinable person; processed partially or completely automatically or non-automatically as part of the data recording system; information such as telephone number, address, e-mail address, fax number, IP address, etc.

Employee Operation Information	These are the data regarding the identity of the individual where it is apparent that the identity is evident or it belongs to a real determinable person; processed partially or completely automatically or non-automatically as part of the data recording system; information regarding the activities he/she conducted, acquired and produced during the employment period of the Employee in our Institution.
Employee Performance and Career Development Information	These are the data regarding the identity of the individual where it is apparent that the identity is evident or it belongs to a real determinable person; processed partially or completely automatically or non-automatically as part of the data recording system; information regarding the performance and development of the Employee (for inst. performance evaluation results, etc.), acquired and produced during his/her employment period in our Institution.
Information on Side Rights and Benefits	These are the data regarding the identity of the individual where it is apparent that the identity is evident or it belongs to a real determinable person; processed partially or completely automatically or non-automatically as part of the data recording system; information regarding the side benefits such as premiums, subsidies, insurances etc. the Employee deserved, acquired and produced during his/her employment period in our Institution.
Information on Family Members and Relatives	These are the data regarding the identity of the individual where it is apparent that the identity is evident or it belongs to a real determinable person; processed partially or completely automatically or non-automatically as part of the data recording system; information about the family members (spouse, mother, father, child etc.) and relatives and emergency contact information to be used within the

	operations conducted by the work units of the Institution, in order to protect the legal and other benefits of the personal data subject and the Institution, regarding the services of the Institution.
Security Information on Physical Space	These are the data regarding the identity of the individual where it is apparent that the identity is evident or it belongs to a real determinable person; processed partially or completely automatically or non-automatically as part of the data recording system; the footage taken at the entrance to the physical space, in the physical location itself during the stay and the personal data about the documents; camera footage, fingerprint records and registries taken at the security point.
Financial Information	These are the data regarding the identity of the individual where it is apparent that the identity is evident or it belongs to a real determinable person; processed partially or completely automatically or non-automatically as part of the data recording system; the personal data processed concerning the information, documents and records that show all kinds of financial results created in accordance to legal relationship established between the Institution and the personal data subject, the bank account number, IBAN number, credit card information, financial profile, assets, income data etc.
Audio Video Information	These are the data regarding the identity of the individual where it is apparent that the identity is evident or it belongs to a real determinable person; photographs and video recordings (other than the Physical Space Security Information), voice recordings and the data appears in the

	documents serve as copies of the documents including personal data.
Personnel Information	These are the data regarding the identity of the individual where it is apparent that the identity is evident or it belongs to a real determinable person; processed partially or completely automatically or non-automatically as part of the data recording system; all kinds of personal data processed in order to procure the fundamental information to compose the personnel rights of the real persons in employment relationship.
Personal Data With Special Quality	These are the data regarding the identity of the individual where it is apparent that the identity is evident or it belongs to a real determinable person; processed partially or completely automatically or non-automatically as part of the data recording system; data indicated in the 6th article of PDP Law (for inst. health data including blood type, biometric information, religion and association memberships, etc.)

6 THE PURPOSES OF PROCESSING PERSONAL DATA

Personal data are processed limited to the purpose and conditions stated below:

- The clear prescription of the relevant act of our Institution regarding the processing of personal data in the law
- The fact that the processing of personal data by the Institution is directly related to and required by the establishment or performance of a contract
- The compulsory nature of the processing of personal data in order for our Institution to fulfill the legal obligations

- Provided that personal data is made public by the personal data subject; processing of the data by our Institution in a limited manner for the purpose of making public
- The compulsory nature of the processing of personal data by our Institution for establishment, use or protection of the rights of the Institution, data subjects or third parties
- Under the condition that the personal data subject's fundamental rights and freedoms are not harmed, personal data transfer is compulsory for the Institution's legitimate interest
- The fact that the personal data processing activities performed by our Institution are obligatory for the protection of the personal data owner's or any other person's livelihood or body integrity and in that case when the personal data owner is unable to give his/her consent due to de facto or legal invalidity
- In circumstances foreseen by the law in terms of Personal Data of Private Nature other than the Personal data subject's health and sexual life
- In terms of personal data subject's private personal data regarding his/her health and sexual life; the data can be transferred with the aims to protect public health, to practice preventive medicine, to make medical diagnosis, to carry out treatment and care services, to plan and manage health services and their finances, the data may be processed by the people or authorized institutions and organizations that are under the confidentiality obligation

In this respect, our Institution processes your personal data for the purposes stated below:

- Identification of employees and suppliers to Institutional systems and follow-up through systems
- Efficiency Management
- The fulfillment of obligations arising from the employment contract and / or legislation.

- Monitoring and supervising of employees' business activities
- Planning and execution of corporate communication activities
- Exercise of the rights and obligations within the scope of the legislation
- Execution of staff procurement processes
- Health Services
- Provision of rights and side benefits
- Creation and follow-up of visitor records

In the event that the processing activity realized with the above-mentioned purposes does not meet any of the conditions foreseen by the PDP Law, explicit consent of the Employees are taken by our Institution regarding the relevant processing period.

7 SPECIAL SITUATIONS OF PERSONAL DATA PROCESSING

Special situations in which personal data is processed will be explained under this title.

7.1 Processing Your Personal Data within the Scope of Maintaining Equal Opportunities

Employees' personal data may be processed to the extent that it is necessary not to discriminate among Employees due to differences in race, ethnic origin, religion, sect, disability and sexual orientation and to ensure equal opportunities among all Employees.

Employees' anonymous data is initially used in order to provide equal opportunities. In case there isn't sufficient anonymous data, personal data will be processed.

7.2 Processing Your Personal Data to Tackle With Irregularities

Personal data sets in different departments may be compared in order to prevent irregular operations that can happen in our institution. Within this scope, any operation, particularly Employees' financial operations, can be checked and related personal data sets in different departments can be examined or compared.

In case of doubt regarding the existence of a serious irregularity as a result of the preliminary examination, personal data related to this operation may be transferred to the parties in question to be examined by the third persons who are experts of the subject.

7.3 Processing Your Personal Data to Give References

The Institution may give reference for the Employees in required fields such as work and training. In this context, the department managers to whom the Employee reports to and other managers on lower levels, if there are any, may give reference about the said Employee. In order for a manager to give reference for any Employee, he/she has to accept doing so for the related Employee.

If the reference is given, Employee's identity information, his/her performance in the workplace, information on Employee's personality traits and qualities may be shared. Information requested by the Employee with his/her explicit consent and information deemed suitable by the person who will give the reference and information asked by the person who requested the reference may also be shared.

Secret references (the type of reference where the Employee can't see the content of the reference) for the Employee will not be given unless the Employee's clear approval is present.

7.4 Processing Your Personal Data in Disciplinary Proceedings and Cease of Employment

Within the scope of possible disciplinary proceedings regarding the Employee, personal data will be accessed only in the amount deemed necessary by the disciplinary proceeding. The required effort will be shown in order to check the accuracy and the up-to-datedness of the personal data and necessary actions will be taken with the condition that the effectiveness of the proceeding is not seriously eliminated.

8 TRANSFER OF PERSONAL DATA TO THIRD PERSONS

Personal data and personal data of a special nature may be transferred to third persons (Please see Section 8.3) in line with the processing purposes by taking the necessary security measures.

8.1 Transfer of Personal Data

Personal data may be transferred to third persons, in line with the data processing purposes; if data subject's explicit consent is present.

If the Employee's explicit consent is absent, personal data may be transferred to third persons when below conditions exist:

- If the laws stipulate a clear regulation on the transfer of personal data,
- If the transfer is compulsory to protect the Employee's or someone else's life or bodily integrity and the personal data owner is not in the position to give his/her consent due to actual impossibility or his/her consent is deemed invalid by the law;
- If there is need to transfer personal data which belongs to the parties of the agreement, with the condition that the data is directly related to the constitution or execution of an agreement,
- If personal data transfer is compulsory in order to fulfill a legal obligation of our Institution,

- If the personal data has been made public by the Employee,
- If personal data transfer is compulsory for the constitution, exercise and protection of a right,
- If personal data transfer is compulsory for the Institution's legitimate interests, on the condition that Employee's fundamental rights and freedoms are not harmed,

8.2 Transfer of Personal Data of a Private Nature

Employee's personal data of a private nature may be transferred to third persons on below situations.

- If the Employee gives explicit consent or
- If the Employee doesn't give explicit consent;
 - Employee's private personal data except for his/her health and sexual life (*data on race, ethnic origin, political thought, philosophical belief, religion, sect or other beliefs, appearance, membership to associations, foundations or unions, convictions and security precautions and biometric and genetic data*) may be transferred in cases stipulated in the law,
 - Employee's private personal data regarding his/her health and sexual life may only be transferred with the purposes to protect public health, to practice preventive medicine, to medically diagnose, to carry out treatment and care services, to plan and manage health services and their finances, in the form that the data may be processed by people under the confidentiality obligation or by authorized institutions and organizations.

8.3 Third Persons To Whom Personal Data is Transferred and Purposes of Transfer

Your personal data may be transferred to below categories of people:

- (i) Koç Group Companies
- (ii) Institution shareholders

- (iii) Institution authorities
- (iv) Institution business partners
- (v) Institution suppliers
- (vi) Legally authorized public institutions and organizations
- (vii) Legally authorized private persons
- (viii) Third persons

The scope of above persons to whom data is transferred and the purposes of data transfer are stated below.

Persons To Whom Data may Be Transferred	Definition	The Aim of Data Transfer
Koç Group Companies	Defines companies in the Koç Holding Inc.	Limited with the purpose of making Employees take advantage of rights and benefits provided for them.
Institution Shareholder	Institution Shareholders are real persons.	Limited with the purpose of making Employees take advantage of rights and benefits provided for the employees, signing contracts of employment, reporting incidents submitted to ethical and discipline committees
Institution Authority	They are real persons in our Institution with the authority to sign.	Limited with the purpose of making Employees take advantage of rights and benefits provided for

		employees, signing contracts of employment, reporting incidents submitted to ethical and discipline committees
Business Partner	Defines parties with which the Institution builds business partnership as it conducts its activities.	Limited with the aim of ensuring the fulfillment of the purpose of establishing the business partnership
Supplier	Defines parties who provide services to our Institution on a contract basis in accordance with the Institution's orders and instructions while carrying out Institution's activities.	Limited with the aim to provide services, which our Institution receives from the supplier based on an outside source, and services required to carry out our Institution's activities.
Legally Authorized Public Institutions and Organizations	Defines public institutions and organizations who have the authority to receive information and documents from our Institution, according to related legislation provisions.	Within the authority of the related public institutions and organizations, limited to their requested aim
Legally Authorized Private Persons	Defines private persons who have the authority to receive information	Within the legal authority of private persons,

	and documents from our Institution, according to related legislation provisions.	limited to their requested aim
Third Person	Defines other parties with whom our Institution shares data with the purposes detailed in the Policy.	Limited to the conditions and purposes stipulated within the scope of the Personal Data Protection Law.

8.4 Matters Regarding Personal Data Transfer to Koç Holding Inc.

Our Institution may transfer Employees' personal data to Koç Holding Inc. within the purposes of processing stated in this Policy and with below purposes:

- Supporting the process of determining and tracking Employees' performance evaluation criteria,
- Supporting the planning and tracking of Employees' side benefits and rights,
- Supporting Group Companies in planning Employees' salary rise packages and premium processes and their execution,
- Supporting the planning of the Institute's human resources strategies, the back-up processes and organizational improvement activities,
- Implementation of the decisions of appointment, promotion and dismissal of Institution's senior executives and making related announcements,
- Supporting the determination of the salary and premium packages of the senior management of the Institution,
- Supporting the planning and execution of processes for measurement of employee commitment in the Institution,
- Supporting planning and execution processes of Employees' career development, training and talent management activities,
- Supporting recruitment processes,

- Supporting group companies our Institution is also a part of, in carrying out corporate law and corporations law transactions
- Supporting harmonization of legislation our institution is subject to,
- Conducting activities to protect the Group's reputation,
- Organization of events for the whole Group,
- Conducting audit activities to ensure that the activities of the Institution are conducted in accordance with Koç Group policies and related legislation,
- Carrying out dialog and communication activities for Employees.

9 TRANSFER OF PERSONAL DATA ABROAD

Personal data may be transferred to foreign countries which are announced to have sufficient protection by the Committee or if sufficient protection is missing, to foreign countries for which data controllers in Turkey and the related country can guarantee a sufficient protection in writing and for which the Committee has permission.

9.1 Transfer of Personal Data Abroad

Personal data may be transferred abroad in line with data processing purposes if the Employee's explicit consent is present or in case the explicit consent is absent, when one of the below circumstances exists:

- If the laws stipulate a clear regulation on the transfer of personal data,
- If the transfer is compulsory to protect the Employee's or someone else's life or bodily integrity and the personal data owner is not in the position to give his/her consent due to actual impossibility or his/her consent is deemed invalid by the law;
- If there is need to transfer personal data which belongs to the parties of the agreement, under the condition that the data is directly related to the constitution or execution of an agreement,
- If personal data transfer is compulsory in order to fulfill a legal obligation of our Institution,

- If the personal data has been made public by the Employee,
- If personal data transfer is compulsory for the constitution, exercise or protection of a right,
- If personal data transfer is compulsory for the Institution's legitimate interest, under the condition that Employee's fundamental rights and freedoms are not harmed,

9.2 Transfer of Personal Data of a Private Nature Abroad

Personal data of a private nature may be transferred abroad in below situations.

- If the Employee gives explicit consent or
- If the Employee doesn't give explicit consent;
 - Employee's private personal data except for his/her health and sexual life (*data on race, ethnic origin, political thought, philosophical belief, religion, sect or other beliefs, appearance, membership to associations, foundations or unions, convictions and security precautions and biometric and genetic data*) may be transferred in cases stipulated in the law,
 - Employee's private personal data regarding his/her health and sexual life may only be transferred with the purposes to protect public health, to practice preventive medicine, to medically diagnose, to carry out treatment and care services, to plan and manage health services and their finances in the form that the data may be processed by people under the confidentiality obligation or authorized institutions and organizations.

10 PERSONAL DATA RETENTION PERIODS

When determining personal data retention periods, requirements introduced by the legal regulations are taken into consideration. Other than legal regulations, the retention period is determined by taking the processing purposes of personal

data into account. If the aim of data processing ceases to exist, the data will be deleted, destroyed or made anonymous as long as there is no legal reason or justification which enables data to be kept.

If aim of data processing ceases to exist; if the retention periods determined by the related legislation and our Institution have passed; personal data can be kept only to constitute evidence in legal disputes or to put forth the related right concerning personal data or to establish defense.

The retention periods are determined based on the periods of limitation for the possible claim of the related right and on examples of requests submitted to the Institution on same subjects, although the periods of limitation have passed. In this case, stored personal data cannot be accessed with any other purpose and access to personal data is realized only if it has to be used in the related legal dispute. After the mentioned time period is over, personal data is deleted, destroyed or made anonymous.

11 SECURITY OF PERSONAL DATA

In order to ensure the security of personal data, reasonable precautions are taken to prevent unauthorized access risks, accidental data loss, and deliberate deletion of data or damage to data.

All kinds of needed technical and physical precautions will be taken in order to prevent people without authorization from accessing personal data. Within this scope, especially the authorization system is established in a way that nobody can possibly access more personal data than needed. Measures that are more stringent are taken when ensuring the security of personal data of a private nature, such as health data.

Authorized persons are checked through the necessary security controls. They are also trained on their duties and responsibilities.

Records of access to personal data are kept to the extent that technical possibilities are available and these records are reviewed periodically. When unauthorized access is at stake an investigation is initiated immediately.

If e-mails or other documents that are not related to the activities of the Institution and that contain the personal data of the Employee are detected, notification for their destruction is given. If necessary actions are not taken during the specified period, the destruction operations are carried out by our Institution.

Our Employees who process personal data comply with the following obligations to ensure the security of the processed data:

- Acting lawfully and honestly in matters relating to the protection of personal data,
- Processing personal data correctly, accurately and completely,
- Doing necessary work to update personal data which lost its up-to-datedness,
- Informing the relevant manager when an unlawfulness in the processing of personal data is noticed
- Providing the necessary directions for the use of legal rights on personal data.

12 PROCESSING OF PERSONAL DATA RELATING TO ELECTRONIC COMMUNICATION OPERATIONS CARRIED OUT BY THE EMPLOYEES IN CONNECTION WITH THEIR WORK ACTIVITIES

The operations that employees perform during their business activities can be of importance both for the safety of the Institution and the Employees as well as for the third parties that the Institution has business relations with. In case personal

data related to Employees' electronic communication operations is processed; the processing of Employee data is treated in accordance with the regulations contained in this Policy.

12.1 Special Rules for Electronic Communication Operations

Prior to initiating a complaint procedure or disciplinary proceeding against Employees based on information about Employees ,obtained through electronic communication operations, it is ensured that the Employee is given the right to see information obtained about him/her and the right to defend himself/herself.

Disciplinary proceedings may be initiated against Employees who process other Employees data unlawfully by acting against the rules set forth in this Policy and who use the information obtained as a result of these activities for other purposes.

12.2 Processing of Personal Data Relating To the Use of Electronic Communication Tools

Employee data may be processed regarding the use of mobile phones, laptops, tablets and similar electronic communication tools, which have been provided or may be provided to the Employee by the Institution. In cases where the obtained data is personal data of a private nature; the provisions of this policy concerning the processing of personal data of private nature shall be taken into consideration. The regulations in this Policy shall be taken into account for the personal data obtained regarding the use of electronic communication tools.

12.3 Processing of Personal Data Relating To Telephone Conversations

Attention is paid that the personal data relating to the communication through our Institution's telephone, numbers that are called and the duration of the communication are used only limited with their processing purposes. In cases where the obtained data is personal data of a private nature; the provisions of

this Policy relating to the processing of personal data of private nature shall be taken into consideration.

12.4 Processing of Personal Data Relating To Corporate E-Mails

Personal data obtained through the employee's corporate email account may be processed to the extent permitted by the legal legislation. In case an implementation is present in this direction, if the data obtained as the result of the activity is personal data belonging to the Employee; the provisions contained in this Policy shall apply.

12.5 Processing of Personal Data Relating To Internet Usage

In cases where legal legislation permits, if personal data is obtained during the use of internet by the Employees; the provisions of this Policy apply to the personal data obtained.

12.6 Processing of Personal Data Relating To Surveillance Camera Application

In cases where personal data is obtained due to the usage of camera recordings for security or similar purposes; your personal data obtained may be processed in the future with purposes such as investigating a suspicious operation, investigating violations of workplace rules and regulations, conflict resolution or using evidence in cases of complaint or with other purposes stated in this Policy.

12.7 Processing of Personal Data Relating To Vehicles Allocated By Our Institution

The provisions of this Policy apply to the processing of personal data obtained during the activities related to the vehicles which are allocated or may in future be allocated to employees.

12.8 Processing of Information Submitted by Third Parties

In certain cases, third parties may be requested to provide information about Employees. These third parties may be banks, credit rating evaluation agencies

and similar research companies. If there is an implementation in this respect, the provisions contained in this Policy regarding the processed personal data are applied.

13 SPECIAL RULES CONCERNING COLLECTED AND PROCESSED PERSONAL DATA RELATING TO EMPLOYEES' HEALTH

13.1 Separate Storage of Health Data and Employees Authorized to Process Health Data

Within the Institution's bounds of possibility, health data is kept separate from other personal data in order to protect it from unauthorized access and to provide higher security. Our institution is committed to processing health data in the most limited scope possible. In cases where health data needs to be processed, persons authorized to carry out this process are notified in a way that they are aware of the sensitivity of these data and that they are able to take the necessary precautions.

13.2 Treatment of Health Data as Personal Data of a Private Nature

Employee health data are regarded as personal data of a private nature. All precautions taken for personal data of a private nature are taken for health data as well.

13.3 Access to Health Data

Access to health data may be realized only if necessary and by Employees who are authorized on this matter. In addition, managers may be provided with health data at the level required to fulfill their managerial roles.

13.4 Alcohol and Drug Tests

In cases where drug and alcohol use cause substantial violations of employment contract, working conditions and discipline rules or serious risks regarding the

mentioned violations occur, alcohol and drug testing may be conducted on the Employee to the extent that legal arrangements permit .

14 LEGAL RIGHTS OF THE EMPLOYEES AND THE METHODS OF THEIR USAGE

14.1 Legal Rights Regarding Personal Data

Legal rights which may be used by the Employees regarding personal data are listed below:

- a. Know whether the personal data is processed or not,
- b. Request information in regards to the processing of their personal data
- c. Know the purpose of the processing of their personal data and whether it is processed in line with the notified and/or consented purpose,
- d. Know the third parties, both local and abroad, the personal data is being transferred to
- e. Request the amendment of the personal data in case it is processed inaccurately or incompletely,
- f. Require to have the personal data to be erased or destroyed within the framework of the provisions in the relevant legislation,
- g. Request the notification of the third parties, the personal data has been transferred to in this respect. in line with clauses (e) and (f)
- h. Object to the decisions taken by automated means that might be detrimental to the Data Subject him/herself.
- i. And to claim compensation for damages caused by a breach of the law.

14.2 Principles on the Exercise of Legal Rights Regarding Personal Data

Employees may use the *"Form for Applications to be Filed by the Personal Data Subject to the Data Controller"* in order to exercise their rights regarding personal data. Applications to be made in this respect are replied within 30 days at the latest.

Employees can access detailed information to use their legal rights in the section with the title *“Rights of the Personal Data Subjects; Exercise and Evaluation of These Rights and Their Methodology”* in the Personal Data Protection Policy.

15 GOVERNANCE STRUCTURE

By force of the Institution's senior management's decision, "Personal Data Protection Committee" has been established in the Institution to manage this Policy and other policies, procedures and implementation guidelines attached and related to this Policy. The duties of this committee are as follows:

- Preparing the basic policies on the protection and processing of personal data, preparing changes when necessary and submitting them to the senior management for approval.
- Implementation of the policies on the protection and processing of personal data and deciding on how to supervise it and within this framework, making assignments in the Institution facilitating coordination and presenting these to the approval of the senior management.
- Determining the necessary matters to be handled in order to comply with the Law on PDP and relevant legislation and presenting the necessary things to do the approval of the senior management; monitoring implementation and facilitating coordination.
- Raising awareness on the protection and processing of personal data within the Institution and in the presence of the Institution’s business partners.
- Identifying the risks that may arise in the personal data processing activities of the Institution and taking necessary measures; proposing improvement suggestions to the approval of the senior management.
- Organizing trainings on the protection of personal data and the application of policies and making sure that they are implemented.
- Making decisions about applications of personal data subjects at the highest level.

- Coordinating the execution of information and training activities in order to inform personal data subjects about personal data processing activities and their legal rights.
- Monitoring developments and regulations regarding personal data protection; providing suggestions to the senior management in accordance with these developments and regulations with regards to the requirements that must be fulfilled within the Institution.
- Coordinating the relations with the Personal Data Protection Board and Institution.
- Performing other duties assigned by the management of the Institution regarding the protection of personal data.

ANNEX -1 DEFINITIONS

Explicit consent	:	Consent relating to a specific subject, based on being informed and expressed with free will.
Making Anonymous	:	It means that the personal data is changed in such a way that it loses its personal data quality and this situation is irrevocable E.g.: Using techniques such as masking, aggregation, data corruption etc. to transform personal data into such a state in which it cannot be associated with a real person.
Processing of personal data	:	Any kind of operation executed with personal data, such as recording, storing, preserving, altering, rearranging, disclosing, transferring, taking over, obtaining, classifying or blocking the use of personal data through completely or partially automatic ways or non-automatic ways with the condition that they are part of a data recording system.
Personal data subject	:	Real person whose personal data is processed. For example; Students and employees.
Personal data	:	Any information related to the identified or identifiable real person. Hence, processing of

	information about legal persons is not within the scope of the Law. For example, name-surname, Turkish Republic Identity Number, e-mail, address, date of birth, credit card number, bank account number etc.
Data Processor	: A real or legal person who processes personal data based on the authority given by the data controller, on his/her behalf. For example, the cloud information firm that stores our Institution's data, etc.
Data Controller	: The person who determines the processing purposes and channels of personal data and manages the space where data is being systematically kept (data recording system).