

CLARIFICATION TEXT OF PERSONAL DATA PROTECTION FOR JOB APPLICATIONS

1. Subject

Within the scope of The Communiqué on the Procedures and Principles to be Followed in Fulfilling the Obligation of Disclosure with Article 10 of the Law on the Protection of Personal Data ("KVKK") No.6698, this text ("Text") has been prepared by Erdem & Erdem Ortak Avukatlık Bürosu and Erdem Erdem Danışmanlık A.Ş. ("E&E") in order to clarify the employee candidate applying to E&E ("Data Owner") regarding the processing of the general and private personal data shared with E&E ("Personal Data").

2. E&E Data Processing Activity and Scope

2.1 Personal Data Processed within the Scope of Compliance with Law

Within the scope of article 5 and article 6 of KVKK, the following Personal Data of Data Owner are processed by E&E without the explicit consent of the Data Owner, in accordance with the possible business relationship with the Data Owner.

- 2.1.1. Name-Surname:
- 2.1.2. TR Identity Number, date of birth,
- 2.1.3. Contact information including address, phone number, e-mail,
- 2.1.4. Travel disability information, if any,
- 2.1.5. Photograph,
- 2.1.6. Photograph and video recordings taken for security purposes,
- 2.1.7. Information on military service status,
- 2.1.8. Information on education, foreign languages and diploma / vocational certificates,
- 2.1.9. Information on previous workplaces,
- 2.1.10. Personal background,
- 2.1.11. Reference information.

2.2 The Processing Method, Legal Reason and Purpose of Personal Data within the Scope of Compliance with Law

Due to the job application that have been made, the Personal Data of the Data Owner is processed in physical and / or electronic media on the grounds that, *i*) It is clearly stipulated in the Labor Law No. 4857, Occupational Health and Safety Law No. 6331, Turkish Code of Obligations No. 6098 and other relevant laws and it is obligatory for E&E to fulfill its legal obligation arisen from these laws, *ii*) It is necessary to process the personal data of the contract parties, provided that it is directly related to the establishment or execution of the employment contract, *iii*) Data processing is mandatory for the legitimate interests of E&E, provided that it does not harm the fundamental rights and freedoms of the Data Owner, and *iv*) The Personal Data has already been publicized by the Data Owner himself.

The Personal Data collected in this procedure is processed through automatic and non-automatic methods for the purpose of determining whether professional seniority, previous

education and knowledge & experience gained in workplaces, previous positions worked and rights are suit for the position and/or open positions applied to; in terms of determining the suitability of professional seniority, previous education, knowledge and experience in workplaces, past positions and rights to our position and / or open positions applied to, evaluating the coherency of corporate culture and customs with current working habits and professional expectations, making assessments on personal characteristics in terms of y adaptation to the work and ensuring workplace and business process security, determining the appropriate wage scale for the task, conducting communication activities, conducting human resources recruitment processes and ensuring physical space security, provided that these purposes are part of a data recording system.

2.3 Transfer of Personal Data Domestically Within the Scope of Legal Compliance

E&E transfers the Personal Data of the Data Owner within the scope of the above-mentioned reasons for compliance with the law and data processing purposes to domestically resident; courts, law enforcement agencies, judicial authorities and authorized private and public institutions and organizations required by the relationship between the parties.

2.4 Personal Data subject to the Data Owner's Explicit Consent, Processing Method and Purpose

In the presence of the Data Owner's explicit consent, during the job application process, E&E processes the following Personal Data in physical and / or electronic media, through automatic and non-automatic methods for the purposes listed below;

Personal Data	Processing Purpose
<ul style="list-style-type: none"> - Name surname - TR Identity Number, date of birth, - Contact information including address, phone number, e-mail, - Disability information, - Travel disability information, if any, - Information on military service status, - Photograph, - Information on education, foreign languages and diploma / vocational certificates, - Information on previous workplaces, - Personal background, - Reference information 	<p>Meeting the workforce need that will arise in the future through the personnel candidate pool system</p>
<p>Miscellaneous information on criminal convictions and security measures, including criminal records.</p>	<p>Ensuring occupational health and safety</p>

2.5 Transfer of Personal Data Subject to Explicit Consent Within the Country

E&E does not transfer the Personal Data specified in the article 2.4 of this Text to any third parties located in Turkey.

3. Data Transfer Abroad

Due to the fact that the databases of E&E's e-mail (Microsoft Outlook) and online meeting service (Zoom or Microsoft Teams) providers are located abroad; while communicating via e-mail or holding an online meeting with E&E, the personal data of the Data Owner which are specified in Articles 2.1 and 2.4 of are kept abroad. Apart from this, the Personal Data of the Data Owner is not shared with any third party abroad.

4. Duration of Processing Personal Data

E&E stores the personal data which is processed in an accurate and up-to-date manner within the current technological methods, limited to the time required by the data processing purpose 5 (five) years and / or in accordance with the legal retention periods. E&E shall delete, destroy or anonymize the personal data ex officio or upon the request of the Data Owner, in the event that the purposes for processing are eliminated and / or the legal retention periods expire.

5. The Rights of Data Owner

Within the scope of Article 11 of KVKK, the Data Owner has the rights of *i*) ascertaining whether any personal data is processed or not; *ii*) requesting information related to the processed personal data, if processed; *iii*) ascertaining the purpose of processing personal data, and whether this data is used in compliance with the(se) purpose(s); *iv*) identifying third parties to whom the personal data is transferred within the country or abroad; *v*) requesting rectification if the personal data is processed in an unsatisfactory or inaccurate manner; *vi*) requesting erasure or destruction of the personal data in the event that the purpose(s) requiring the processing of personal data disappear and there is no legal obstacle within the framework of Article 7 of the Law; *vii*) requesting to send notification regarding the correction or deletion / destruction / anonymization to the third parties to whom the personal data had been transferred in case of any correction or deletion / destruction / anonymization; *viii*) objecting to the processing of the personal data, exclusively through automatic means, which results to an unfavorable consequence for the Data Owner and ix) claiming compensation for the damages due to the unlawful processing of the personal data.

In order to exercise the afore-mentioned rights, the Data Owner shall convey the requests in writing, along with the information that will enable identification, to E&E through the following means of communication:

- a. via e-mail to istanbul@erdem-erdem.av.tr ;
- b. via mail to the address “*Ferko Signature, Büyükdere Caddesi, No. 175, Kat. 3, 34394 Esentepe - Şişli, İstanbul*”.

6. Content

This Text covers the terms and conditions of the E&E Personal Data Protection Policy published by E&E on the website <http://www.erdem-erdem.av.tr/hakkimizda/kisisel-verisinin-korunmasi-politikasi/>.