

SAHA BİLGİ TEKNOLOJİLERİ EĞİTİM DANIŞMANLIK SANAYİ TİCARET A.Ş.

EMLOPEE PERSONAL DATA PROCESSING AND PROTECTION POLICY

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1. INTRODUCTION

1.1. Purpose and Scope of the Policy

I. Personal Data Protection Law 6698 (“**The Law**”) entered into force on April 7, 2016. The aim of this Saha Bilgi Teknolojileri Eğitim Danışmanlık Sanayi Ticaret A.Ş Employee Personal Data Protection Policy (“**Employee Policy**”) is to set the principles for Saha Bilgi Teknolojileri Eğitim Danışmanlık Sanayi Ticaret A.Ş. (“**SAHA**” or “**the Company**”) to act according to The Law, and to fulfill its obligations concerning the protection of personal data.

The Employee Policy defines the conditions for processing personal data and the Company’s fundamental principles while doing so. The Policy encompasses the Company’s all personal data processing activities, the data subjects, and all the processed personal data in scope of The Law.

The glossary regarding the Employee Policy is in the Appendix-1

1.2. Enforcement and Amendments

The Employee Policy has been published at the Company and made available for the Employees’ attention. The Company reserves the right to make amendments to The Policy in parallel with legislative regulations. In the case of any conflict between The Policy and the Law or the current regulations, the provisions in the regulations will be in effect.

2. PURPOSE OF PROCESSING PERSONAL DATA BY THE COMPANY AND DATA CATEGORIES

2.1. Data Subjects in the Scope of the Employee Policy

Data subjects in the scope of the Employee Policy are all employees whose personal data is being processed by the Company. Within this scope, the data subjects can be interns, employees with authorised signatory, white collar employees or blue collar employees.

2.2. Purposes for Data Processing

2.2.1. General Purposes Regarding the Processing of Employees’ Personal Data

Personal data and personal data of special nature may be processed by the Company for the following purposes in accordance with the terms of personal data processing:

MAIN PURPOSES	SUB-PURPOSES
<p>To Plan and to Carry Out Company’s Human Resources Policies and</p>	<ol style="list-style-type: none"> 1. To Plan and to Carry Out the Professional Development Activities 2. To Fulfill the Obligations for the Faculty and Staff Arising From the Employment Contracts and Relevant Regulations. 3. To Plan and to Effectuate the Allowances and the Benefits for Employees 4. To Plan and Carry Out Company’s Internal Orientation Activities 5. To Plan and Carry Out the Dismissal Processes 6. To Manage the Salaries 7. To Plan and Carry Out the Human Resources Procedures
	<ol style="list-style-type: none"> 8. To Carry Out Recruitment Processes 9. To Plan and to Carry Out the Appointment, Promotion and Dismissal Processes 10. To Plan and to Follow Employee’s Performance Evaluation Processes.

<p>Processes</p>	<ol style="list-style-type: none"> 11. To Monitor the Work of the Employees 12. To Plan and to Execute the educational Operations Inside the Company 13. Planning and Execution of Employee Satisfaction and/or Commitment Processes 14. Planning and Execution of Recommendations for the Improvement of the Disclosure Processes of The Service of Employees 15. Planning and/or Execution of Production and Operations Processes
<p>Realization of Commercial Activities Carried Out by the Company and Conducting Related Business Processes</p>	<ol style="list-style-type: none"> 1. Event Management 2. Planning and Execution of Business Activities 3. Planning and Execution of Corporate Communication Activities 4. Planning and Execution of Commercial Operations Processes 5. Planning, Supervision and Execution of Information Security Processes 6. Creation and Management of Information Technology Infrastructure 7. Planning and Execution of Partners and/or Suppliers' authorisation for Access to Information 8. Tracking Finance and/or Accounting Affairs 9. Planning and Execution of Corporate Sustainability Activities 10. Planning and Execution of Corporate Governance Activities 11. Planning and/or Execution of Business Sustainability Activities
<p>Planning and Executing the Company's Commercial and/or Business Strategies</p>	<ol style="list-style-type: none"> 1. Management of Relationships with Partners and/or Suppliers 2. Project Planning
<p>Ensuring Legal, Technical and Commercial-Business Security of the Company and the Persons involved in Business Relationship with the Company</p>	<ol style="list-style-type: none"> 1. Tracking of Legal Affairs 2. Planning and Execution of The Necessary Operational Activities for The Provision of Company Procedures and/or Conduct of Company Activities in Accordance with Applicable Legislation 3. Providing Information Regarding Legislation to Authorized Organizations 4. Creating and Tracking of Visitor Records 5. Planning and Execution of Emergency Management Processes 6. Effectuating Transactions regarding Companies and Partnership Law. 7. Planning and Execution of Company Audit Activities 8. Planning and/or Execution of Occupational Health and/or Safety

	<p>Processes</p> <p>9. Realization of Risk Management</p> <p>10. Provision of Workplace Security</p> <p>11. Ensuring the Security of Company Operations</p> <p>12. Planning and/or Execution of the Company's Financial Risk Processes</p> <p>13. Ensuring the Safety of Company Fixtures and/or Resources</p>
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2.2.2. Activities Related to the Processing of Employees' Personal Data

The following information is given about the personal data processing activities carried out within the framework of the employment relationship established by the Company with its employees.

- **Monitoring of communication, e-mails and internet traffic:** all data, such as e-mail content and the date of sending, and all internet traffic information may be processed by the Company due to Law No. 5651 on internet access provided on the Company's facilities and campuses and can be processed by the Company if necessary. Communication, e-mail and internet services allocated by the Company to employees are prohibited for special use other than work.
- **Disciplinary and anti-irregularity activities** may require processing employee's personal data. In scope of Disciplinary investigations initiated to uncover irregular transactions, various employee personal data may be processed and any data processing activities, such as comparison, may be carried out regarding all data that can be obtained from within or outside the Company.
- **The common areas of Company buildings and workplaces can be monitored** under occupational health and safety rules with security cameras and images can be processed for the purposes specified in this Employee Policy.
- **The Computer allocated by the Company can be monitored** and your personal data within electronic devices can be processed. The use of such electronic devices for personal purposes other than work and the storage of private personal data outside of the business are prohibited.
- **To plan and to effectuate the allowances and benefits for employees,** such as establishing health insurance, personal data may be processed. If data is transferred to third parties within the scope of planning the establishment of allowances and interests for employees, the transfer is made limited to the purpose and additional measures are taken by the Company if the transferred data is of special nature.
- **Health data of employees** is processed in the narrowest possible scope. As a rule, access to health data can only be carried out by authorized employees (workplace doctor and human resources authority). If necessary. In cases where health data needs to be processed, information is provided for people authorized to perform the processing; to ensure they understand the sensitivity of this data and to make them take necessary measures.

2.3. Personal Data Categories

Within the scope of employees personal data processing activities carried out by the Company, it is processed the personal data categorized below based on one or more one of the personal data processing conditions specified in Articles 5 and 6 of the Law.

PERSONAL DATA CATEGORIES	DESCRIPTION
Identity Information	All kinds of identity information as appears on the driving license, the ID card, the domicile certificate, the passport, the lawyer ID, the marriage certificate, etc.
Contact Information	All kinds of information that provides communication with data subjects such as, phone number, address, e-mail, etc.
Family Members and Close Relatives	Personal info about the employees' parents and relatives.
Physical Space Safety Information	Personal data on records and documents, like video recordings when entering the physical facility and during the time spent there.
Process Security Information	Personal data processed to ensure technical, administrative, legal and commercial security while conducting business activities
Financial Information	Personal data about financial outcomes, as on documents and records created according to the legal nature of the relationships with the data subject.
Personnel Affairs	Payrolls, discipline investigation, hiring and dismissal records, declaration of property, personal background, performance evaluation, etc.
Employee Performance and Career Development Information	The personal datas, which process into the purpose of measuring the performance of the natural persons which are employees, also collaborators and scheduling, also conducting them within the context of the human resources policy of the Company.
Other Rights and Advantage Information	The scheduling of the present and future presentations of other rights and advantage plannig for natural persons which are employees and collaborators, also determining the criterias of earning the right to those other rights, advantage planning, plus the personal datas which process to follow the earnings.
Legal Act and Compliance Information	Personal data processed within the scope of determination and pursuance of our claims and rights, payment of our debts, and compliance with our legal obligations and the Company's policies.
Audit and Supervision Information	Personal data processed within the scope of the Company's legal obligations and compliance with Company policies
Special Categories of Personal Data	Data related to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade-union, health, sexual

	<p>life, criminal conviction and security measures, biometrics and genetics.</p> <p>From this category, health information and criminal conviction records are processed.</p> <p>In addition, if the employee has included in his identity, his or her knowledge of association and foundation membership can also be processed if he / she has stated in his CV through his identity copy.</p>
Demand/Complaint Management Information	Personal data regarding the receipt and evaluation of any request or complaints address to the Company
Reputation Management Information	Information about collected to protect the Company's commercial reputation and related evaluation reports and actions.

3. PRINCIPLES AND CONDITIONS FOR PROCESSING PERSONAL DATA

3.1 Principles For Processing Personal Data

The Company processes your personal data as aligned with the principles specified in article 4 of The Law. It is compulsory to follow these principles for each and every personal data processing activity:

- ***The personal data are processed lawfully and in conformity with rules of bone fides;*** The Company acts according to the laws, the secondary legislation and the general legal principles; it pays attention to process the data as limited to the purpose, and to take account of the reasonable expectations of the data subjects.
- ***The personal data are processed for specific, clear and legitimate purposes:*** The Company determines the purposes of processing personal data before taking action, and makes sure that these purposes are not against the law.
- ***The personal data must be related, limited and proportional to the purpose of processing:*** The Company limits the data processing to the personal data necessary for the purpose of collecting data, and takes steps to prevent the processing of any unrelated data.
- ***The Personal data will be kept as long as necessitated by the regulations or by the purposes of processing*** The Company will delete, destroy or anonymize the personal data when the purpose of data collection disappears , or at the end of the period specified in the regulations.

3.1. Conditions for Processing Personal Data

The Company will process your personal data when at least one of the conditions stipulated in article 5 of The Law is present. Below are the details of these conditions:

- ***Explicit consent of the data subject:*** If none of the other conditions is present, and subject to the general principles listed under item 3.1, the Company may process personal data in the case that the data subject freely gives informed and explicit consent specific to the operation in question.
- ***The purpose of personal data processing is clearly stipulated in the laws:*** In this case, the Company may process personal data without the explicit consent of the data subject, within the principles in the related legal procedures.

- ***The data subject is physically incapable of giving consent and it is mandatory to process personal data:*** If the data subject is not in a situation to give consent or if such consent is invalid, the Company may process personal data in order to protect the life or the bodily integrity of the data subject or of a third party.
- ***The data processing is directly related to the drafting and the execution of a contract:*** The Company will process personal data if this is necessary for the drafted or signed contract between the data subject and the Company.
- ***In the event if processing of personal data is necessary for compliance with a legal obligation to which the data controller is subject,*** the Company processes the personal data for the purpose of fulfilling its legal obligations envisaged under the scope of the applicable legislation.
- ***In the event if personal data have been made public by the data subject himself/herself,*** the personal data, which is announced to public by the data subject and which is presented to the information to everyone as a result of making public, may be processed by the Company without the explicit consent of the data subject, but limited to the purpose of the revealed information.
- ***In the event if data processing is necessary for the establishment, exercise or protection of any right,*** the Company may process the personal data of the data subjects without their explicit consent under the scope of the obligation.
- ***In the event if processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject,*** the personal data may be processed by the Company, provided that the balance of interests of the Company and the data subject shall be protected. Within this scope, the Company firstly determines its legitimate interests gained by the result of the processing activity during the data processing depending on the legitimate interests. It evaluates the effects of personal data processing on the rights and freedoms of the data subject and proceeds with data processing if convinced that the balance of interests is not damaged.

3.2. Conditions for Processing of Special Categories of Personal Data

Article 6 of The Law defines the limited number of personal data of a special nature. These are; race, ethnic origin, political opinions, philosophical convictions, religion, sect or other beliefs, appearance and dress, membership of an association, foundation or trade-union, health, sexual life, criminal conviction, security measures, and biometric and genetic data.

The Company may process personal data of a special nature under the following circumstances, at the condition of taking the additional measures stipulated by the Personal Data Protection Board:

- ***Processing of the personal data of a special nature except for those concerning health and sexual life,*** they may be processed at the condition that the data subject gives explicit consent or it is clearly specified in the laws.
- ***Personal data concerning health and sexual life,*** they may only be processed, without seeking explicit consent of the data subject, by the persons subject to secrecy obligation or competent public institutions and organizations, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing.

Within this scope, personal data concerning health are processed by obtaining the explicit consent of our employees.

4. TRANSFER OF PERSONAL DATA

The Company may transfer personal data abroad or within Turkey in case there are conditions for transferring personal data, if it conforms to the conditions stipulated in articles 8 and 9 of the Law and to the additional regulations determined by the Personal Data Protection Board.

- **Transfer of personal data to third parties in Turkey**, if at least one of the conditions in articles 5 and 6 of The Law, as explained under item 3 of this Policy is present, and at the condition of complying with the fundamental principles of data processing, your personal data may be transferred by the Company.
- **Transfer of personal data to third parties abroad**, your personal data may be transferred by the Company to third parties abroad, without explicit consent, if at least one of the conditions in articles 5 and 6 of The Law, as explained under item 3 of this Policy is present, and at the condition of complying with the fundamental principles of data processing. Transfer of the personal data to third parties abroad shall be performed through sharing with group companies and using cloud computing programs.

In the case that the country where the data will be transferred is not one of the countries listed by the Personal Data Protection Board as having an adequate data protection level, personal data may be transferred to third parties abroad, upon the existence of commitment for adequate protection in writing by the Company and data controller in the relevant country, authorisation of the Personal Data Protection Board, and the presence of at least one of the conditions in articles 5 and 6 of The Law (see Policy, item 3).

The Company may transfer personal data to the parties listed on the table below, within the data processing provisions in The Law’s general principles and articles 8 and 9:

CATEGORIES OF THE PARTIES	SCOPE	PURPOSE OF TRANSFER
Business Partner	The parties with whom the Company established a business relation to conduct its commercial activities	Sharing the personal data is limited as needed for the accomplishment of the purposes of business partnership.
Supplier	The parties that provide services for the Company’s commercial activities, in accordance with the instructions from the Company and based on the contract between them and the Company	Transfer of personal data is limited to the services provided externally by the supplier.

Legally Authorized Public Institution	Public agencies and institutions that have legal authority to ask for information and documents from the Company	Sharing the personal data is limited to the purpose of the information requested by the public agencies and institutions.
Legally Authorized Private Institution	Private legal entities that have legal authority to ask for information and documents from the Company	Sharing the personal data is limited to the purpose of the information requested by the private legal entities authorized by law to ask for this information.

5. OBLIGATION TO INFORM THE EMPLOYEES AND THE RIGHTS OF THE EMPLOYEES

According to article 10 of The Law, the data subjects must be informed that their data will be processed before beginning to process, or during the processing at the latest. As per this article, the Company, in its capacity as data controller, has created the necessary infrastructure to inform the data subjects whenever personal data will be processed. Within this scope;

- Please see the item 2.2 in this Policy about the purpose of the processing of your personal data.
- Please see the section 4 in this Policy about the parties to whom your personal data are transferred, and the purpose of the transfer.
- Please see the items 3.2 and 3.3. of this Policy about the conditions concerning the collection of your personal data via various channels in physical or electronic environments.
- As per the article 11 of The Law, you, in your capacity as data subject, have the right to:
 - Learn whether or not your personal data have been/are being processed,
 - Ask for details if your personal data have been processed,
 - Learn the purpose of processing your personal data and whether or not these have been used in accordance with the purpose,
 - Learn to whom your personal data have been transferred in Turkey or abroad,
 - Request rectification if your personal data are processed incompletely or inaccurately, and ask that the third parties to whom your data were transferred be notified of the amendments,
 - Request deletion or destruction of your personal data in the case that the reasons for processing the data have disappeared even though they were duly processed according to The Law, and ask that the third parties to whom your data were transferred be notified of this change,
 - Object to any outcome detrimental to your person, resulting from an analysis of your personal data solely via automatic systems,

- Request compensation for any damages you incurred because of an unlawful processing of your personal data.

We would like to note that you can send your applications regarding your rights listed above to the headquarters of the Company by post or to Company's personal data processing committee by e-mail. Depending on the nature of your request, your application will be processed free of charge within the shortest possible time and within thirty days at the latest; however, in the case that the process involves additional charges, you may be asked for payment according to the tariff set by the Personal Data Protection Board.

Upon receipt of an application, the Company first checks that the applicant is the actual right holder. However the Company may also ask for additional and detailed information as it deems necessary to clarify the request.

The Company will respond to the applicant in writing or via electronic medium. If the request is rejected, it will be explained with the justifications to the applicant.

6. DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

In the case that the reasons for processing personal data disappear even though they were processed in accordance with the law, as required by article 7, the Company will delete, destroy or anonymize the data on its own motion or upon request by the data subject, as specified in the Company's handbooks. Also, the employees, assuming the title of the data processors and acting accordingly to this obligation of extermination, offer the necessary services in order to destroy the data of their own business process.

7. OBLIATIONS OF "PROTECTING THE PRIVACY AND DATA SECURITY OF THE EMPLOYEES"

Each Employee has confidentiality obligation regarding the personal data obtained in their business processes and to act in accordance with the Law while performing his duty in accordance with the capacity of the data processor. If the Company is damaged due to a violation of this obligation, this loss will be compensated by offsetting the Employee's progress. While the employee conducts data processing activities; In case of violation of the obligation to comply with the policies regarding data security, privacy and personal data protection, the termination of the employment contract can be applied by evaluating the severity of the violation.

The actions below that may subject to disciplinary and criminal proceedings and result in withdrawal:

- Disclosure of the confidential informations, which are in the possession of the Company and customers, personal and private informatios in a public platform.
 - The transfer of a company's personal datas and sensitive personal datas to a stranger on the purpose of directy or indirecty harming the Company and gaining unfair adavantage.
 - Illegal enregistering of the personal datas which procured by the business process,
 - Within the scope of the Law, to act in violation of all kinds of policies/procedures/instructions/commitments, primarily personal data processing and

retention, personal data retention and destruction policies and/or to allow violations to be realized by being passive against violations.

In addition, each employee is obliged to use the technical equipment provided to protect data security in accordance with data security standards, to keep their passwords safe and up-to-date, not to use the equipment they do not know in the products allocated by the Company, to show the required sensitivity regarding data security of business processes, and act in accordance with the Information Security Statement of the Company. In the event if the Company suffers a damage caused by a violation of this obligation, this damage will be compensated by deducting from the progress payments of the Employee.

ANNEXE-1: DEFINITIONS

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Explicit Consent	Freely given, specific and informed consent.
Anonymization	Rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data.
Employee	Natural persons who are the employees of the Company.
Personal Data	Any information relating to an identified or identifiable natural person.
Relevant Person/Data Subject	The natural person whose personal data are processed.
Processing of Personal Data	Any operation which is performed on personal data, wholly or partially by automated means or non-automated means which provided that form part of a data filing system, such as collection, recording, storage, protection, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization, preventing the use thereof.
The Law/ KVKK	Personal Data Protection Law No. 6698 dated April 7, 2016
Special Categories of Personal Data	Personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations or trade-unions, data concerning health, sexual life, criminal convictions and security measures, and the biometric and genetic data.
Business Partners	The persons with whom the Company established a business relation to conduct its commercial activities based on the contract between them and the Company.
Data Processor	The natural or legal person who processes personal data on behalf of the data controller upon its authorization.
Data Controller	The person who determines the purposes and means of processing personal data and manages the data filing system.