

# UNDER NO 6698 THE LAW ON THE PROTECTION OF PERSONEL DATA CLARIFICATION TEXT

## 1-PURPOSE

"Personal data", the definition of which will be given below (under the heading of "2-Definitions"), has taken its place as a fundamental human right in Articles 8 of the Declaration of Fundamental Rights of the European Union and 16 of the Treaty on the Functioning of the European Union.

In addition, personal data is regulated in Article 20 of the Constitution of the Republic of Turkey titled "Privacy of Private Life" and included among the fundamental rights. Due to this importance, the Law on the Protection of Personal Data No. 6698 ("KVKK") was established and entered into force by being published in the Official Gazette dated April 7, 2016 in order to protect the fundamental rights and freedoms of individuals, especially the privacy of private life, in the processing of personal data belonging to real persons and to regulate the obligations and procedures and principles to be followed by real and legal persons who process personal data. Considering the importance we attach to fundamental human rights and the superior value of personal data as HİSARLAR MAKİNA, this Illumination Text ("Clarification Text") has been prepared within the scope of the Law on the Protection of Personal Data No. 6698, within the scope of the obligation stipulated by the KVKK. Pursuant to the KVKK, as the Data Controller, HİSARLAR MAKİNA informs its members, member candidates and third parties whose personal data will be processed, as follows and informs them as follows within the scope specified in Article 10 of the KVKK.

## 2- DEFINITIONS

<b>Expect Assent</b>	It refers to the consent on a particular subject, based on information and expressed with free will.
<b>Cookie</b>	They are small files that are saved on users' computers or mobile devices and help store preferences and other information on the web pages they visit.
<b>Related User</b>	Except for the person or unit responsible for technical storage, protection and backup of the data, they are the persons who process personal data within the organization of the data controller or in line with the authorization and instruction received from the data controller.
<b>Annihilation</b>	Deletion, destruction or anonymization of personal data.
<b>Contact Person</b>	The natural person notified by the data controller during registration to the Registry for the communication to be established with the Institution, regarding the obligations of the legal persons residing in Turkey and the representative of the data controller of the legal entity not residing in Turkey within the scope of the Law and secondary regulations to be enacted based on this Law.

(The contact person is not authorized to represent the Data Controller. As the name suggests, it is only the person assigned to provide the "liaison" of the communication of the data controller and the Institution.)

<b>Recording Medium</b>	Any environment where personal data is processed wholly or partially automatically or non-automatically, provided that it is a part of any data recording system.
<b>Personal Data</b>	Any information relating to an identified or identifiable natural person.
<b>Processing of Personal Data</b>	Any operation performed on personal data such as obtaining, recording, storing, preserving, changing, rearranging, disclosure, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or by non-automatic means provided that it is part of any data recording system.

### 3- PURPOSE AND LEGAL REASONS FOR THE PROCESSING OF YOUR PERSONAL DATA

HİSARLAR processes only your general and mandatory special quality personal data as required, measured and for a certain period of time within the scope of KVKK.

#### ***Legal Reasons for Personal Data Processing***

Your Personal Data will be processed, first of all, based on your explicit consent, for the following reasons;

- Within the scope of Article 5 of the KVKK titled "Conditions for the Processing of Personal Data",
- Provided that it is directly related to the establishment or performance of a contract, it is necessary to process the personal data of the parties to the contract,
- It is mandatory for the data controller to fulfill its legal obligation,
- Provided that the publicization is compatible with the purpose of the Association, it has been made public by the person concerned,
- Data processing is mandatory for the establishment, exercise or protection of a right,
- In addition to these, in cases where data processing is necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject,
- Execution of membership application and membership processes, including the transactions stipulated in the Association's Bylaws, evaluation and decision making of the membership application, fulfillment of the obligations regarding these and keeping the relevant records, receiving or making payments and donations.

### 4- YOUR PERSONAL DATA WE PROCESS

Clearly belongs to an identified or identifiable natural person; processed in a partially or fully automated manner or in a non-automated manner as part of the data recording system; personal data related to information such as name, surname, telephone number, address, e-mail address, fax number, IP address, records and documents taken at the entrance to the physical

space and during the stay in the physical space; camera records and records taken at the security point, photographs and camera records (except for the records entered within the scope of Physical Space Security Information), data contained in documents that are copies of documents containing personal data, SGK records, registry information, personal data related to activity reports, records taken during field tests, records taken in 6-month periods for the purpose of TÜBİTAK projects, shipment information, control forms, customer data sheets and dealer forms, personal resume given at consent, Records taken during image acquisition of equipment, data sharing between units, records related to skill matrices, special quality personal data that must be processed, marital status, citizenship status, records regarding criminal convictions and security measures, health data, sharing of health data within the company, partially or processed completely automatically or non-automatically as part of a data recording system; Personal data regarding the receipt and evaluation of any request or complaint directed to HİSARLAR MAKİNA is processed by HİSARLAR MAKİNE.

## 5- PROCESSING TIME OF YOUR PERSONAL DATA

Your personal data will be processed for a minimum of 10 (ten) years during the periods required by the personal data processing purposes specified in this text. After the expiry of the said period, if there is a legislative provision or legal reason that stipulates the processing of the relevant data for a longer period of time, your personal data will continue to be processed during these periods. At the end of these periods, your personal data will be immediately deleted, destroyed or anonymized.

## 6- METHOD OF COLLECTING PERSONAL DATA

Your personal data is collected through the forms you fill in electronically on the platform, your visits to HİSARLAR MAKİNE, job applications, CVs sent with consent, signed contracts and e-mails.

## 7- TRANSFER OF PERSONAL DATA

Within the scope of the above-mentioned data processing purposes, your personal data may be shared with public legal entities, trade unions, units within the company, private persons or judicial authorities authorized by HİSARLAR. No data transfer is made that does not concern the purposes of the Company. For example; Your IP address information or the information of your vehicle license plate that we have obtained in accordance with your consent is not shared with any 3rd person, including the persons and institutions shown above. The only exception to this determination is that the transfer of the data in question is required by law. Your personal data is not transferred abroad by HİSARLAR MAKİNA in any way.

## 8- RIGHTS OF THE RELATED PERSON

### Within the scope of KVKK;

- i.* To learn whether your Personal Data is processed or not,
- ii.* If your Personal Data has been processed, requesting information about it,
- iii.* To learn the purpose of processing your Personal Data and whether they are used in accordance with its purpose,
- iv.* To know the third parties to whom your Personal Data is transferred at home or abroad,
- v.* If your Personal Data is processed incompletely or incorrectly, to request correction of them,
- vi.* Requesting the deletion or destruction of your Personal Data within the framework of the conditions stipulated in the KVKK legislation,,
- vii.* Requesting notification of the transactions made within the scope of articles v and vi to the third parties to whom your Personal Data has been transferred,
- viii.* Objecting to the emergence of a result against you by analyzing the processed data exclusively through automated systems,,
- ix.* If you suffer damage due to the unlawful processing of your Personal Data, you have the right to demand the removal of this damage. The Law introduces a number of remedies for the persons concerned to convey their requests regarding the implementation of the Law and to protect their rights regarding their personal data. Thus, in order to exercise their rights regarding the protection of their personal data, the persons concerned will not only be able to apply directly to the judiciary, but also to use other legal remedies brought by the Law. The first of the legal remedies brought by the law is the application method to the data controller (HİSARLAR MAKİNA) regulated in Article 13. The second is a complaint to the Personal Data Protection Board regulated in Articles 14 and 15. In addition, in the event that the Board learns about the alleged violation of rights, it has the authority to examine the matters that fall within its scope of ex officio.

## 9- MEASURES TAKEN REGARDING YOUR PERSONAL DATA

All necessary technical and administrative measures are taken by HİSARLAR MAKİNA to prevent the unlawful processing of your personal data, to prevent unlawful access to your personal data, and to ensure the appropriate level of security in order to ensure the preservation of your personal data.

TECHNICAL MEASURES
Authority Matrix
Authority Control
Access Logs
User Account Management
Network Security
Application Security
Encryption
Penetration Test
Intrusion Detection and Prevention Systems
Log Records
Data Masking
Data Loss Prevention Software
Backup
Firewalls
Current Anti-virus Systems
Delete, Destroy or Anonymize
Key Method

ADMINISTRATIVE MEASURES
Preparation of Personal Data Processing Inventory
Corporate Policies (Access, Information Security, Use, Storage and Disposal etc.)
Contracts
Privacy Commitments
In-house Periodic and/or Random Audits
Risk Analysis
Employment Contract, Disciplinary Regulation
Corporate Communication (Crisis Management, Reputation Management)
Training and Awareness Activities (Information Security)
Notification to Data Controllers Registry Information System (VERBIS)

## 10-DATA RESPONSIBLE AND CONTACT PERSON

- **Data Controller Information**

FULL ADDRESS: HİSARLAR MAKİNA SANAYİ TİCARET A.Ş.

CENTRAL: ESKİŞEHİR

ADDRESS: Hisar Mh.1047 Cd. No:2 26550 Tepebaşı, Eskişehir / TURKEY

TEL: 0 (222) 411 24 30

FAX: 0 (222) 411 22 47

- **Contact Person**

NAME SURNAME: EBRU AKÇA

E-MAIL:

## 11- APPLICATION FORM FOR DATA SUPPORTER

Personal data owners (hereinafter referred to as the "Applicant") defined as the data subject in the Personal Data Protection Law No. Pursuant to the first paragraph of Article 13 of the KVKK; Applications to be made to HİSARLAR MAKİNA, which is the data controller, regarding these rights must be submitted to us in writing or by other methods determined by the Personal Data Protection Board.

In this context, applications to be made to our Company in writing, by printing out this form;

- With the Applicant's application in person,
- Through a notary,
- It may be signed by the Applicant with the "secure electronic signature" defined in the Electronic Signature Law No. 5070 and sent to the Company's registered electronic mail address. Below, information is given about the written application channels regarding how the written applications will be delivered to us.

APPLICATION METHOD	APPLICATION METHOD	APPLICATION METHOD
Personal Application (Applicant comes in person and applies with a document proving his identity)	<b>Hisar Mah. 1047 Cd. No:02 26550 Tepebaşı/Eskişehir</b> <b>TEL: +90 222 411 24 30</b>	"Information Request Under the Law on Protection of Personal Data" will be written on the envelope.
Notification through a notary public	<b>Hisar Mah. 1047 Cd. No:02 26550 Tepebaşı/Eskişehir</b> <b>TEL: +90 222 411 24 30</b>	"Information Request Under the Law on Protection of Personal Data" will be written in the notification envelope.
Via Registered Electronic Mail (KEP) by signing with a "secure electronic signature"	<b>...Hisarlar Machine KEP Address...</b>	"Personal Data Protection Law Information Request" will be written in the subject part of the e-mail.

In addition, after the other methods to be determined by the Board are announced, how the applications will be received through these methods will be announced by HİSARLAR MAKİNA. Your applications submitted to us will be answered within thirty days from the date of receipt of your request, in accordance with the second paragraph of Article 13 of the KVKK, depending on the nature of the request.

Our answers will be delivered to you in writing or electronically in accordance with the provisions of Article 13 of the relevant KVKK.

**Applicant contact information:**

<b>NAME:</b>	
<b>SURNAME:</b>	
<b>T.R. IDENTIFICATION NUMBER:</b>	
<b>PHONE NUMBER:</b>	
<b>EMAIL</b>	
<b>ADDRESS:</b>	

**Lütfen HİSARLAR MAKİNA ile olan ilişkinizi belirtiniz.** (Müşteri, iş ortağı, çalışan adayı, eski çalışan, üçüncü taraf firma çalışanı, hissedar gibi)

<input type="radio"/> <b>CUSTOMER</b>	<input type="radio"/> <b>BUSINESS PARTNER</b>
<input type="radio"/> <b>VISITOR</b>	<input type="radio"/> <b>OTHER</b>
The unit you are in contact with in our company : .....	
Subject : .....	

<input type="radio"/> <b>FORMER EMPLOYEE</b>	<input type="radio"/> <b>JOB APPLICATION, I SHARED CV</b>
<input type="radio"/>	
Years of work: .....	Date: .....
<input type="radio"/> <b>OTHER</b>	<input type="radio"/> <b>I AM THIRD PARTY EMPLOYEE</b>
.....	Please indicate the company and position information you work for.....

