



# DATA PROTECTION POLICY FOR COMPANY STAFF

IGDP\_P4 VERSION 1.00

# ALADDIN MIDDLE EAST LIMITED – TURKEY BRANCH OFFICE

## DATA PROTECTION POLICY FOR COMPANY STAFF

This privacy notice has been prepared pursuant to Article 10 of Law No. 6698 on Personal Data Protection Act concerning notification requirements and Circular on Modalities of compliance regarding notification obligations of data controllers. This privacy notice (Notice) explains how Aladdin Middle East Limited – Turkey Branch Office (hereinafter referred as the “Company” or “AME Turkey”, we, our, us) collects, uses and shares (or "processes") personal data of staff (including workers such as temporary employees), prospective staff (i.e. job applicants) (you, your), and your rights in relation to the personal data we hold

We may collect your personal data in a number of ways, for example (for the avoidance of doubt, this is not an exhaustive list):,

- Where necessary, we collect your personal data as explained below,
- during the course of your employment or engagement with us, as a member of staff, for example when you provide or update your contact details, when you or another member of staff completes paperwork regarding your performance appraisals, and in the course of fulfilling your employment (or equivalent) duties more generally
- Within the framework of the purpose that constitutes the base of processing and in connection with this purpose, in a limited and measured manner,
- from the information you provide to us before making a job application, for example when you come for an interview maintaining the accuracy and currency of personal data,
- Your personal data is recorded, stored, preserved, reorganized, shared with the institutions legally authorized to request this personal data and transferred to third parties inside the country and abroad under the conditions stipulated by the Personal Data Protection Law ("Law").
- In various other ways as you interact with us during your time as a member of staff, and afterwards, where relevant, for the various purposes set out below

### WHAT KIND OF PERSONAL DATA WE PROCESS?

We may collect the following types of personal data about you (and your family members and 'next of kin', where relevant):

Personal Identification Information	Name, surname, date of birth, place of birth, gender, marital status, nationality, Turkish identity card information (personal identification number, serial number, ID card number, father's name, mother's name, place of birth, province, district, neighborhood, volume number, family serial number, serial number, household number, page number, registration number, place of issue, reason for issue, date of issue, previous surname),
-------------------------------------	--

	copy of identity card)
Contact and Communications Information	Telephone number, full address information, e-mail address, extension number information (internal phone number, corporate e-mail address)
Sensitive data	Health report, blood type cards, employment and periodic examination forms signed by the on-site doctor, pregnancy status, pregnancy report, health and maternity leave information, criminal record
Financial Data	Financial and salary details, payrolls, premium progress payments, premium amounts, file and debt information regarding debt enforcement proceedings, bank account, minimum subsistence allowance information
Education Data	details of your education and references from your institutions of study; foreign language proficiency, occupational training and skills, courses taken, CV
Audio-visual Data	Your image and likeness, including as captured in photographs taken for work purposes or CCTV
contact details for your family members and 'next of kin'	Marriage certificate; name, surname of spouse and children, T.R.Identity Number, gender, date of birth, phone number; name, surname and phone number of your family members and 'next of kin'
Work Related Information	Registration number, position name, department and unit, title, last employment date, entry and exit dates, insurance entry / retirement, allocation number, social security number, saving deposit insurance fund number, tax office number, flexible hours working status, travel status, pension fund, pension fund entry date, pension fund registration number, social security organization for artisans and the self-employed entry date, registration number, accounting code, number of working days, projects worked, monthly total overtime information, severance pay base date, severance pay additional days, overtime consent information
Staff performance and Carrier Development Details	Education and skills, details regarding training received, e-mail, signed participation form, assessment of monthly performance and goal realization, activity information
Paid and Unpaid Leave	Leave seniority base date, leave seniority additional days, leave group, departure / return date, day, reason for leave, address / phone during vacation
Exposure to harmful substances	Exposure measurements of our workers, validation of exposure measurement results and similar exposure groups, comparison of occupational exposure limit values and results and reporting the results in accordance with modalities and principles specified in Regulation on Occupational Hygiene, Test and Analysis Laboratories and Workplace Environment.
Other	Military discharge / postponement, vehicle license plate, vehicle mileage information, vehicle location, driver's license copy, traffic ticket query result, private pension fund details, martyr's relative status, intern status, boarded service, boarding stop data, employee internet access logs, entry exit logs, employee daily activity data.

## **The bases for processing your personal data, how that data is used and whom it is shared with**

1. To meet our legal obligations as an employer (for example, relating to child protection, employment, health and safety, statutory reporting to competent authorities, once you are employed or engaged by us in any capacity, for the performance of the contract of employment (or other agreement) between you and us, we also process your personal data because it is necessary for our or a third party's legitimate interests. Our "legitimate interests" include our interests in running the Company in a professional, sustainable manner, in accordance with all relevant legal and regulatory requirements, administering job applications and, where relevant, offering you a role with us, carrying out due diligence checks on you, whether during the application process for a role with us or during your engagement with us, including by checking references in relation to your education and your employment history;
2. Pursuant to company's legal obligation and legitimate interest to provide workplace security, including by operating security cameras in various locations on the Company's premises and the production of photo ID cards;
3. Based on legitimate interest of the Company in pursuing business, through systems that control entry and exit times; through the tracking devices we install on the vehicles belonging to the Company, we may collect location data regarding the tracking of your use of vehicles and gasoline supplied to you in order to ensure workplace safety and to fulfill our legal obligations,
4. For security purposes, including by operating security cameras in various locations on the Company's premises and the production of photo ID cards,
5. We process special categories of personal data (such as data concerning health or criminal convictions) for the reasons set out below:  
We will process this data on the basis that such processing is necessary to carry out obligations and exercise rights (both yours and ours) in relation to your employment. In particular, we process the following types of special category personal data for the following reasons: your physical or mental health or condition(s) (for example, where required to monitor and record sickness absences, dietary needs, or to make reasonable adjustments to your working conditions or environment – including as part of the comparison of occupational exposure to harmful substances with limit values and reporting the results);
6. Through legal documents and notifications that are notified to us to fulfill our legal obligations,
7. We collect your personal data through the cookies used on our website, as detailed in the Cookie Policy, in accordance with the legitimate interest of the Company to improve its platform and make it more effective when you visit our web site.

## **How we process your data?**

We process your data in a related and limited way for the purposes and legal reasons stated below:

- For the administration of the company, the execution of the business and the application of company policies,
- In order to fulfill our legal obligations to comply with the provisions of Labor Law, Occupational Health and Safety Law, Social Security Law and related legislation and other laws and legislative requirements,
- In order to maintain security in the Company premises,
  - In order to honor our obligations related with contracts signed with our customers.

Your personal data will be kept for the maximum period specified in the relevant legislation or required for the purpose for which they are processed, and at the longest for the duration of statutory limitation period. Modalities of how we detain and delete personal data are explained in detail in our Data Retention and Management Policy.

## **Sharing your information with others**

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we will share your personal data with certain third parties. Depending on your employment status and role, we may disclose limited personal data to a variety of recipients including but not limited to: public authorities such as Personal Data Protection Authority, Ministry of Finance, the Ministry of Customs and Trade, Ministry of Labor and Social Security, Turkey Business Association (İş-Kur), Information Technologies and Communications Authority pursuant to legislation listed below:

- Labor Law,
- Occupational Health and Safety Law,
- Sosyal Security legislation,
- Law No 5651 on Regulation of Publications on the Internet and Suppression of Crimes Committed by means of Such Publication,
- Turkish Code of Commerce,
- Law No 6698 on Personal Data Protection,
- Law No 5115 on Identity Notification

Furthermore;

For the purposes of execution of your labor contract, we use following services from contractors:

- Third parties processing data on our behalf as part of administering payroll services, the provision of benefits including pensions, etc.). Your data are stored in the application's own data recording medium.

In order to carry out our legal obligations within the scope of Labor Law, Occupational Health and Safety Law, Social Security Law and related legislation and other laws and regulations;

- With consultancy firms and private employment offices we work with in order to obtain consultancy on the determination and calculation of incentives that we can benefit within the scope of R&D legislation.
- With in-house doctors and health professionals in order to ensure that you receive treatment and necessary examinations are made.
- We may share payroll information to company auditors so that they can carry out audit activities.

In order to ensure security at Company premises;

- Law enforcement agencies and local authorities in order to inspect the entrances and exits for workplace safety

In order to comply with our legal obligations:

- In order for us to exercise our right of defense, we may share your data with our lawyers and relevant institutions within the framework of our obligation to fulfill warrants and subpoenas such as court orders or evidence requests, provided that it is in accordance with the law and criminal procedure. We may also share your data with our advisers where it is necessary for us to obtain their advice or assistance;

In order to manage the company, to carry out the business, to implement company policies;

- In order to ensure our internal operation with other entities in the Company's Group or business partners,
- Our service providers for reasons such as transportation, vehicle supply, business card printing, parking lot registration etc.
- In order to fulfill service contracts with our customers, we may transfer your data to third parties to whom we provide services.

We may transfer your personal data to third parties, if you give your consent, in order to ensure communication in overseas travel and training, make travel arrangements on your behalf, implement service contracts, in connection with organizing events and administration of your social and sporting activities and send bulk e-mails in a manner compliant with the provisions of law and resolutions of Data Protection authorities.

## **WHAT RIGHTS DO YOU HAVE CONCERNING YOUR PERSONAL DATA?**

You have the following rights as prescribed by the Article 11 of the Law No.6698:

- to obtain access to, and copies of, the personal data we hold about you,
- to learn the purpose of his/her data processing and whether this data is used for intended purposes,
- to know the third parties to whom his/her personal data is transferred at home or abroad.
- to request that we erase your personal data;
- to request that we restrict our data processing activities in relation to your personal data;
- to object to the processing, exclusively by automatic means, of your personal data, which leads to an unfavorable consequence for you,
- to request compensation for the damage arising from the unlawful processing of his/her personal data.
- to receive from us the personal data we hold about you, which you have provided to us, in a reasonable format specified by you, including for the purpose of transmitting that personal data to another data controller; and
- to require us to correct the personal data we hold about you if it is incorrect.

Please note that the above rights are not absolute, and requests may be refused where exceptions apply.

If you have any questions about these rights or how your personal data is used by us, you should contact the Data Protection Liaison Officer.

The Supervisory Authority (KVKK) does recommend you seek to resolve any issues with the data controller initially prior to any referral to it. If you have any queries about this privacy notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact your line manager or the Data Protection Liaison Officer via e-mail address given below.

If following such referral, you are still not satisfied with how your personal data is used by the Company you can make a complaint to the Supervisory Authority.

The Company will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

## **COMMUNICATION**

**ALADDİN MİDDLE EAST LİMİTED ŞİRKETİ - TÜRKİYE ANKARA ŞUBESİ**

Address :Karum İş Merkezi İnan Caddesi No:21/394 Çankaya ANKARA

Telephone : (+90)0 312 427 90 20

E-Mail :kvkk@ame.com.tr

Web Site :ame.com.tr