



# CCTV Policy

IGDP\_P8 VERSION 1.00

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## **Section 1: Data Controller**

This Policy document constitutes the Aladdin Middle East Limited – Turkey Branch Office, having its registered office at the following address “Karum İş Merkezi İnan Caddesi No:21/394 Kavaklıdere Çankaya/Ankara” (hereinafter referred as the “Company” or “AME Turkey”) CCTV Policy and aims to provide information relating to purposes for which we gather and process personal data pursuant to Law No 6698 on Personal Data Protection (hereinafter referred as “Law”, in order to be transparent and accountable to data subjects in relation to the processing of CCTV data in accordance with Article 10 of the Law. Accordingly, the purposes for which our Company processes personal data, to whom and for what purposes the processed data can be transferred, our personal data collection methods and legal reasons and the rights of the data subject may be found below

## **Section 2: CCTV recordings and legal basis**

2.1 This CCTV Policy applies to the premises owned or controlled by AME Turkey. For the avoidance of any doubt, this Policy has no application to premises not in the ownership or control of the Company (e.g. external institutions).

2.2 In this section, we give you detailed information about the type of CCTV image we collect, why we use CCTV and what we do with CCTV recordings/images, and the lawful basis relied upon.

2.3 We use CCTV (video only, no audio/sound-recording) on our premises, at internal and external points. CCTV cameras are mounted on fixed-points, with no auto-tracking capabilities.

2.4. For the avoidance of doubt, it is our corporate policy that CCTV monitoring/profiling of an individual based on any of the following characteristics is prohibited:

- Age
- Civil status
- Disability
- Gender
- Membership to a trade union, political party etc.
- Race
- Religion
- Sexual orientation

1.5.CCTV will be utilized in a fair and ethical manner. The location of cameras is a key consideration. Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy (e.g. bathrooms, changing rooms, etc.) is considered by AME Turkey to be unjustifiable and unethical.

1.6.AME has endeavored to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals. Cameras placed so as to record external areas are positioned in such a way as to prevent or minimize recording of passers-by or of another person's private property.

2.7. In any area where CCTV is in operation, there will be a prominent sign displayed notifying people of same. For the avoidance of any doubt, there shall be no covert CCTV recording.

2.8. A data protection impact assessment (DPIA) is undertaken when installing or making adaptations to CCTV systems where the processing is likely to result in a high risk to the rights and freedoms of data subjects.

2.9. The purposes of CCTV and the legal basis of same are set out below:

	<b>PURPOSES</b>	<b>LEGAL BASIS</b>
1.	<p>For security:</p> <ul style="list-style-type: none"> <li>(a) To deter unauthorized access to the Company's property</li> <li>(b) To protect the Company's buildings and assets (including but not limited to materials, files and data our staff) both during and after working hours;</li> <li>(c) To capture images of those perpetrating criminal offences on the premises, including in the car-parking areas, main entrance, exit gates etc. (including intruders or individuals damaging property or removing items without authorization) so that the recordings can be passed to law enforcement agencies, and used for criminal prosecutions;</li> <li>(d) To support law enforcement agencies and other civil authorities to detect and deter crime, and to identify, apprehend, and prosecute offenders;</li> <li>(e) To reduce the incidence of crime and anti-social behavior (including theft and vandalism);</li> <li>(f) To provide a sense of security and safety to the staff members, service-providers, and visitors to our premises.</li> <li>(g) To monitor activity in the areas where cash is received from and receipted to individuals and/or where goods are received from couriers and/or service providers (Reception);</li> <li>(h) The monitoring of access control systems: to monitor and record restricted access areas at</li> </ul>	<p>Public interests/substantial public interests: to prevent and/or detect fraud, theft and crime, to ensure that the AME adequately protects its property and assets purchased/financed/maintained in tis premises.</p> <p>Legal obligation: Company's duty of care to individuals who have a business relationship with the company, i.e. staff, business associates, stakeholders and visitors to its premises.</p> <p>Vital interests: the processing is necessary in order to protect the vital interests of the data subject or of another natural person.</p> <p>Prevention, investigation and detection of offences: the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security</p>

	<p>entrances to buildings and other areas;</p> <p>(i) verification of security alarms: Intrusion alarms, exit door controls, external alarms;</p>	
2.	<p>To uphold Company's policies/procedures to promote occupational safety and well-being:</p> <p>(a) To ensure that corporate rules and policies are respected so that the AME can be properly managed.</p> <p>(b) To deter any instances of bullying, harassment, and/or all other forms of unwanted and/or inappropriate behavior.</p> <p>(c) To ensure that Company's Bullying Prevention policy and all other relevant policies are implemented so that the Company can be properly managed. For the avoidance of any doubt, this means that CCTV footage may be used as part of any corporate procedure, including but not limited to a disciplinary, suspension, or expulsion process under the disciplinary code and procedure. This means that the CCTV footage may be viewed by the board of management and disciplinary committee.</p>	<p>Legal obligation: Company's duty of care to individuals who have a business relationship with the company, i.e. staff, business associates, stakeholders and visitors to its premises.</p> <p>CCTV recordings may be used to the extent necessary to comply with legal obligations in the field of occupational safety and health.</p> <p>Vital interests: the processing is necessary in order to protect the vital interests of the data subject or of another natural person.</p> <p>Public interests/substantial public interests:</p> <ul style="list-style-type: none"> <li>to maintain discipline and good order, to ensure that other staff do not have their professional activities seriously disrupted by misbehavior of others,</li> <li>to ensure that staff members are not exposed to risks to their health and safety (including causing distress, anxiety, or any threat to physical safety).</li> <li>to prevent and/or detect fraud, theft and crime, to ensure that the AME adequately protects property and assets</li> </ul>
3.	<p>For verification and dispute-resolution purposes, particularly in circumstances where there is a dispute as to facts and the recordings may be capable of resolving that dispute.</p>	<p>Public interests/substantial public interests: to prevent and/or detect fraud, to ensure that facts can be objectively verified to avoid disputes leading to costly litigation. For dispute resolution and litigation purposes.</p>
4.	<p>For litigation purposes.</p>	<p>Public interests/substantial public interests: to ensure that all relevant data is available for litigation purposes, to ensure the effective administration</p>
5.	<p>For verification and dispute-resolution purposes as part of any investigation to the extent necessary for the determination of the circumstances prevailing in specific cases and for external investigation processes such as</p>	<ul style="list-style-type: none"> <li>Legal Obligation: depending on the nature of the request, this may include a request from external agencies as part of external investigations, e.g.: The Ministry of Family, Labor and</li> </ul>

	occupational and health safety and criminal investigations	<p>Social Services, Ministry of Trade, Social Security Institution etc. may require us furnish specific information (including a report), document regarding an issue that falls under the scope of their jurisdiction.</p> <ul style="list-style-type: none"> <li>• National security, law enforcement or criminal investigation matters – law enforcement agencies: per Article 23(1)(d) GDPR: the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security</li> <li>• Vital interests: the processing is necessary in order to protect the vital interests of the data subject or of another natural person.</li> </ul>
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The above- mentioned information is an indicative, non-exhaustive list. We will utilize CCTV for purposes not necessarily listed here provided there is a legal basis, and/or we are legally required to do so.

### **Section 3: Recipients of CCTV recordings**

We share and transfer CCTV recordings data to other data controllers at our own volition or upon request by competent authorities within the scope of ensuring the legal, technical and commercial-business security of the persons who are in a business relationship with the Company and ensuring the security of the locations of the Company pursuant to Articles 8 and 9 of the Law. In this section we give you further information about the recipients or categories of recipients of the personal data.

3.1. Law Enforcement Agencies: for the investigation, detection and prevention of offences.

3.2. In cases where footage is necessary for the services performed by the employees of the public institutions in charge of tax, social security and occupational health and safety.

3.3. Insurance Companies, Legal Advisors and Lawyers: The AME Turkey transfers and shares CCTV recordings with its insurers, competent public authorities, and their duly appointed workplace investigators, claims handlers etc. The Company also shares/transfers CCTV data to its legal advisors. These transfers are for the purposes of obtaining legal advices, resolving disputes, and defending, compromising or otherwise settling litigation.

CCTV data may also be transferred to the Health & Safety Authority when investigating workplace accidents.

3.4. CCTV administrators and IT support: to assist us with the administration and maintenance of the CCTV system and associated hardware and software.

3.5. Other parties: where you give your consent or instruct us to do so (e.g. to your solicitor, to your union representative etc.), or where we are otherwise legally required (e.g. a Court Order).

#### **Section 4: Third country/international transfers**

We do not transfer your personal data to a third country or international organization. If the transfer is required, we will take necessary measures prescribed in Article 9 of the Law No.6698 and inform relevant parties.

#### **Section 5: Automated decision making/profiling**

We do not engage in ADM/profiling.

#### **Section 6: Data Subjects' rights**

6.1. The Company acknowledges and respects the rights afforded to Data Subjects under the Article 11 of the Law including following rights:

- to learn whether his/her personal data are processed or not,
- to request information if his personal data are processed by the The Company,
- 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 the rectification of the incomplete or inaccurate data, if any,
- to request the erasure or destruction of his personal data under the conditions laid down in law,
- to request notification of rectification, erasure or destruction operations carried out pursuant his/her request to third parties to whom his personal data has been transferred,
- to object to the processing, exclusively by automatic means, of his/her personal data, which leads to an unfavorable consequence for the data subject,
- to request compensation for the damage arising from the unlawful processing of his/her personal data.

For further information, please see section (6) of our Data Protection and Processing Policy available at <https://aladdinmiddleeast.com>, or alternatively contact our DPO.

## Section 7: Contact our DPO

You can send your requests and opinions concerning closed circuit camera system recordings and protection of your personal data to the following address "kvkk@ame.com.tr".

Data subjects can fill the Data Subject Application Form whose link can be found in our web site in order to exercise their rights in respect of their personal data. Applications must be send with documents that establish the identity of the data subject using one of the following modalities:

- By filling the aforementioned form and sign the form with wet-ink signature by hand, via notary public or by registered mail to the following address “Karum İş Merkezi İnan Caddesi No: 21/394 Kavaklıdere Çankaya / Ankara”,
- By filling the aforementioned form and attaching a secure signature in accordance with the provisions of Law No 5070 on Electronic Signatures and e-mailing to “kvkk@ame.com.tr”,

The company reserves the right to request information from the applicant in order to verify the identity of the data subject and direct questions to data subject in order to clarify the matters specified in the application.

