



Privacy Notice for Prospective Employees

IGDP_N1 VERSION 1.00

Aladdin Middle East Limited – Turkey Branch Office

Privacy Notice for Prospective Employees

This privacy notice describes what personal data is processed by Aladdin Middle East Ltd. Turkey Branch Office (hereinafter will be referred to as "AME Turkey" or "the Company") and its affiliates in regard to job applicants, potential candidates for employment and our optional recruiting programs and events, and selection procedures in view of potential recruitment at AME Turkey. It describes the information we collect, what we do with it (the "purpose") and our lawful reason for processing it (our "legal basis"), with whom we share it, how long we store it and what rights and obligations you as an applicant have. Any reference to "we", "us", "our" and "the Company" is to the Aladdin Middle East Limited – Turkey Branch Office. We're known as the "data controller". You can contact us at kvkk@ame.com.tr for more information about how we process your data, including how to exercise your rights as a data subject.

Data Controller: Aladdin Middle East Limited – Turkey Branch Office

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

Telephone : (+90)0 312 427 90 20

Types of data we process in the context of the application process

Pursuant to Law No. 6698 on Protection of Personal Data ("KVKK"), personal data means information about personal or factual circumstances of a specific or identifiable natural person. This includes information such as your name, address, telephone number, personal identification code and date of birth, but also data about your specific career, etc., which can be assigned to a specific person with reasonable effort. Information that is not (in)directly

Personal data that we collect directly from applicants

This Privacy Notice covers any candidate data that is collected by AME Turkey for the recruiting process. This may include but is not limited to the following information:

1. Your identification details (first and last name), contact details and candidate status.
2. Information included in your CV or cover letter, such as employment history, academic background, skills and competencies, personal interests, languages spoken, and questionnaire results.
3. Employment history, job preferences and type of employment sought and willingness to relocate.
4. Names and contact details of referees. Please note that it is your responsibility to obtain consent from your referees prior to providing us personal information about them.
5. Current and historic salary details together with salary expectations.

Company may collect data from third parties, in order to conduct employment background check, to the extent this is permitted by the applicable laws.

6. In addition to aforementioned information notes about the candidate may be created by persons working for the AME Turkey to process, manage candidates and to handle communication through and in-between recruiting activities.

During the recruitment process we might ask you to participate in assessment days, complete tests, or occupational personality profile questionnaires, and/or to attend an interview – or a combination of these. Information will be generated by you and by Company staff members. For example, you might complete a written test, or we might take interview notes. The data collected from you is voluntary and is not based on a statutory or contractual obligation to provide the personal data. One of the reasons for processing your data is to allow us to carry out an effective recruitment process. Whilst you are under no obligation to provide us with your data, we may not be able to process, or continue with (as appropriate), your application.

Personal data we collect from other sources

We may publish job openings on occupational platforms, and we may also find you based on your availability and profile settings in the same. In the event you apply for an opening at AME Turkey through an application function on an occupational platform or similar online service provider (“Partner”), it is important to note that the relevant Partner may retain your personal data and may also collect data from the Company in respect of the progress of your application.

This includes our recipients of personal data (see below) that may, depending on their features, enrich data by way of analytics and collecting data about a candidate based on publicly available information about you.

We may also receive your personal data from a third party who recommends you, or informs us of your eligibility, as a candidate for a specific opening or for our business more generally.

Candidate assessment days, tests or occupational personality profile questionnaires, attending an interview – or a combination of these will result in personal data generated by you, us and potentially a third party in the event that there is third party involvement. Any use by a Partner of your data will be in accordance with the Partner’s Privacy Notice and subject to the terms and conditions between you and Partner on one hand, and AME Turkey and Partner on the other.

Automated processing of personal data

We do not use any automated decision making in recruitment. There is a human intermediary in each processing activity even in the event that we use third party recruitment tools with certain automated features.

The purposes and legal basis for the processing

Your personal data is processed for the purposes of managing Company's recruitment related activities. Consequently, AME Turkey may use personal data in relation to the evaluation and selection of applicants as needed in the recruitment process, including procuring manpower.

Your personal data is processed for the following purposes throughout our recruitment process:

1. Identifying potential candidates for open or future positions;
2. Determining your qualifications for employment and reaching a recruitment decision;
3. Evaluating your suitability for other employment vacancies available at the Company;
4. Verifying the data you submit through referees;
5. Conducting background checks (subject to the applicable national legislation). We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us;
6. Informing you, via e-mail, SMS or otherwise about the progress of your application for employment with the Company;
7. Protecting our rights and fulfilling our legal obligations; and
8. Notifying you, via e-mail, SMS or otherwise about other local or global vacancies at the Company that we consider you suitable to make an application of employment for;
9. Enhance information that we receive from you with information obtained from third party data providers.

If your application results in a favorable decision, your personal data submitted for recruitment purposes may be processed for the necessary employment procedures and included in your personnel file.

If your application is not being moved to the next stage of the recruitment process, AME Turkey may (subject to your freely given consent) nevertheless continue to retain and use your personal data collected during the recruitment process in order to consider you for new positions.

Why we process your data (Legal basis)

Lawful, fair and transparent data processing is at the core of Company's recruitment process. AME Turkey processes the personal data generated throughout the recruitment and communication process relying on the following reasons:

Purpose of processing	Legal Basis	Categories of Personal Data
Identifying potential candidates for open or future positions;	In order for us to carry out our legitimate interests	Data submitted by you and data obtained from Business Partners and third parties
Determining your qualifications for employment and reaching a recruitment decision	To enter into / perform a contract for services with you	Data submitted by you and data obtained from Business Partners and third parties
Evaluating your suitability for other vacancies	Consent of the applicant	Data submitted by you and data obtained from Business Partners and third parties
Verifying the data you submit through referees	Consent of the applicant	Details of your qualifications and any professional status
Conducting background checks	To comply with our legal obligations i.e. to carry out statutory checks	Data submitted by you and data obtained from Business Partners and third parties
Informing you, via e-mail, SMS or otherwise about the progress of your application for employment with the Company	Actions necessary prior to entering into employment or service contract	Name, phone number, email
Protecting our rights and fulfilling our legal obligations;	In order for us to carry out our legitimate interests	Name, notes of your application process
Informing you, via e-mail, SMS or otherwise about other vacancies at AME Turkey that we consider you suitable to make an application of employment for.	Consent of the applicant	Name, phone number, email
Enhance information that we receive from you with information obtained from third parties	Legitimate interest (further subject to national laws)	Data submitted by you and data obtained from Business Partners and third parties

Sharing your data

Only selected employees of the Company, such as Senior Management, potential future line managers or HR staff, and selected third parties who support us with the recruitment process, have access to your personal data. Except as set out in this policy or as required by law, your personal data will not be supplied to any third party without your explicit authorization.

Notes about the candidate may be created by persons working for us in order to process, manage candidates and to handle communication through and in-between recruiting activities.

We do not use online recruiting tools to receive and manage the application and thus for the purpose of (possible) establishing an employment relationship. We would like to point out that, if we choose to use such services, we will remain responsible for the processing operations ourselves. We will maintain processes designed to ensure that any processing of

personal data by third party service providers is consistent with this Privacy Notice and protects the confidentiality, availability, and integrity of your personal data. Where required by law, we will put in place legal mechanisms designed to ensure adequate data protection of your personal data via data processing agreements and audit mechanism.

Transfers of your personal data to third countries

Depending on the strategic importance of the position you apply for, following the submission of your application, the information you have sent to us can be made available to Corporate Headquarters and subsidiaries (including certain third countries) in order to be processed in line with aforementioned purposes. A list of the members of the AME group companies in third countries that can have access to and may process your personal data in accordance with this Privacy Notice for Prospective Employees is available at <http://aladdinmiddleeast.com/Contact-Us/EN/1/63/B>. This transfer will be reliant on applicable data transfer mechanisms approved under the Article 9 of the KVKK.

How long we keep your data for

In line with data protection principles, we only keep your data for as long as we need it for and this will depend on whether or not you are successful in obtaining employment with us.

If your application is not successful and we have not sought consent or you have not provided consent upon our request to keep your data for the purpose of future suitable job vacancies, we will keep your data for one year once the recruitment exercise ends, taking into consideration our need to answer queries or resolve problems and comply with legal requirements under the applicable laws.

If we have sought your consent to keep your data on file for future job vacancies, and you have provided consent, we will keep your data for three years once the recruitment exercise ends. At the end of this period, we will delete or destroy your data, unless you have already withdraw your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent. We are then obliged to delete or anonymize your data. In this case, the data are only available to us as so-called metadata without direct personal reference for statistical evaluations (e.g. women's or men's share of applications, number of applications per period, etc.) If after this period, we feel it necessary to retain your records, we will write to you.

If you receive and accept an offer for employment with us as part of the application process, we will store the personal data collected during the application process for at least the duration of the employment relationship. You can nevertheless always ask us to delete your data by sending your request via email to kvkk@ame.com.tr

Your rights in relation to your data

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- The right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- The right of access. You have the right to access the data that we hold on you. To do so, you should make a subject access request
- The right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it
- The right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it
- The right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct
- The right to portability. You may transfer the data that we hold on you for your own purposes
- The right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests
- The right to regulate any automated decision-making and profiling of personal data. You have a right not to be subject to automated decision making in way that adversely affects your legal rights.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent.

The Company may accept applications submitted by Subject Access requests (SARs) in accordance with Article 11 of the Law or reject them stating the precise reasons for the refusal.

- Right to complain to the supervisory authority about any alleged misuse of data

If your request is declined, you find our response unsatisfactory or the response is not given in due time, the data subject may lodge a complaint with the supervisory authority within thirty days of receipt of the response of the Company, or within sixty days as of the application date, in any case. The supervisory authority in Turkey for data protection matters is the Personal Data Protection Board. If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the Board.

Data subjects can fill the Subject Access Request 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 delivering the wet signed copy 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.

If you have any questions, need more information or guidance please contact kvkk@ame.com.tr.

