



CCTV Privacy Notice

IGDP_N3 VERSION 1.00

Aladdin Middle East Limited – Turkey Branch Office

CCTV Privacy Notice

By entering our premises, you acknowledge that your images shall be processed by the CCTV system of Aladdin Middle East Limited – Turkey Branch Office (hereinafter referred as the “Company” or “We”). This Privacy Notice gives you some helpful information about who we are, what CCTV images we collect, why, who we share it with and why, how long we keep it, and your rights.

For further information on how we use this CCTV and the legal basis for same, please go to Section 2 of our CCTV Policy available at <https://aladdinmiddleeast.com/>. This CCTV Privacy Notice and the CCTV Policy should be read together with Company’s Data Protection and Processing Policy, a copy of which is available at <https://aladdinmiddleeast.com/>

1. Purpose of Processing

We operate Closed Circuit Television Systems (“CCTV”) on our premises both during the daytime and during the night hours each day. CCTV is used at external points on the premises (e.g. at front gates, in the car-park, etc.) and at certain internal points (e.g. front desk/reception area, corridors etc.). In areas where CCTV is in operation, appropriate notices will be displayed. We use CCTV for security purposes within the framework of personal data processing conditions and purposes specified in Articles 5 and 6 of the Law No. 6698 on Personal data Protection; to protect premises and assets; to deter crime and anti-social behavior; to assist in the investigation, detection, and prosecution of offences; to monitor areas in which cash and/or goods are handled; to deter bullying and/or harassment; to maintain good order and ensure the Code of Behavior is respected; to provide a safe environment for all staff and visitors; for verification purposes and for dispute-resolution, particularly in circumstances where there is a dispute as to facts and the recordings may be capable of resolving that dispute; for the taking and defense of litigation

2. Parties that We may transfer Personal Data and Transfer Purposes

Pursuant to provisions of Article 8 and 9 of the Law No. 6698, we share CCTV footage upon request by legally authorized institutions and organizations within the scope of ensuring the legal, technical and commercial-business security of the persons who conduct business with the Company and ensuring the security of the locations of the Company. We share information with our CCTV provider/s (technical support services). We may show the CCTV images to authorized officers of the Company as part of a Code of Behavior process. In appropriate circumstances, we also share CCTV images/recordings to law enforcement agencies (for the investigation, detection and prevention of offences); to government agencies if it is needed for occupational safety and health purposes; to the Company’s insurance company and legal advisors (for dispute resolution and litigation purposes) etc. For further information on who we share your data with, when and in what circumstances, and why, please see our Data Protection and Processing Policy available at <https://aladdinmiddleeast.com/>

3. How We gather Personal Data, Retention Schedules and Legal Basis

3.1. Personal data is collected by authorized staff members in charge of the security / information desk at the entrance of the building, and in addition, security cameras installed to ensure the security of the building and its surroundings are recorded throughout the day. Personal data is processed for the following purposes: as per Article 5/2/a it is clearly provided for by the laws; it is necessary for the Company to perform its legal obligations such as our duty to safeguard and supervise staff members; as per Article md.5/2/e for the establishment, exercise or protection of any right; as per md.5/2/f for our legitimate interests, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

3.2. CCTV is generally held for 15(fifteen) days. In certain circumstances, CCTV recordings may be held for longer, for example

(a) where a break-in or theft is recorded (in which case they will be held and passed to law enforcement officers, and/or the Company's insurance company and legal advisors)

(b) Where an injury/accident occurs (in which case CCTV may be retained and may subsequently be passed to Company's insurance company, its legal advisors, the Health & Safety Authority and its officers)

(c) Where a breach of the Code of Behavior is reported resulting in a staff member being disciplined, in which case the recordings will be retained to be viewed by disciplinary committees (if possible the images will be appropriately redacted/pixelated to protect the personal data of third parties), the Board of Management, for the purposes of hearings, appeals, dispute resolution and/or verification purposes

These examples are not exhaustive, and there will be other situations where the CCTV is retained for longer than 15 days where there is a legal basis and/or we are legally required to do so. For further information on the retention periods, please refer to our Data Protection and Processing Policy available at <https://aladdinmiddleeast.com//>

4. Data Subject Rights and Modalities for Usage

Pursuant to Article 11 of the Law No. 6698, you have the following statutory rights, that can be exercised at any time:

(a) Right to complain to supervisory authority

(b) Right of access

(c) Right to rectification

(d) Right to be forgotten

(e) Right to restrict processing

(f) Right to data portability

(g) Right to object and automated decision making/profiling (Company does not use any automatic profiling methods)

(h) right to request compensation for the damage arising from the unlawful processing of personal data.

For further information and queries regarding closed circuit camera system recordings and protection of other personal data, please consult our Data Protection Liaison Officer at kvkk@ame.com.tr

You can exercise your rights and ask us about the processing of your personal data. If you have any questions or comments regarding CCTV procedures, please email kvkk@ame.com.tr or use the subject access request form to make your request or send it to the following address: Karum İş Merkezi, İnan Cad.No:21/394 Kavaklıdere - Ankara, Türkiye

