

## AVEC TURİZM OTELCİLİK İNŞAAT TİCARET A.Ş. CLARIFICATION TEXT

This clarification text has been prepared to inform you about how your personal data is used by the data controller for what purpose, how and for what reason it is processed, with whom it is shared and for how long it is stored. Disclosure is made within the scope of Article 10 of the Law on the Protection of Personal Data No. 6698.

We as **AVEC TURİZM OTELCİLİK İNŞAAT TİCARET A.Ş.** ("Workplace"), present this clarification text we have prepared in accordance with Article 10 of the Law on the Protection of Personal Data No. 6698 ("Law") and that contains information about the personal data processing activity, specifically for the security camera and video and audio recording of the workplace, to the public and to the data subjects.

### ARTICLE 1: DATA CONTROLLER

Your personal data, in the capacity of data controller **AVEC TURİZM OTELCİLİK İNŞAAT TİCARET A.Ş.** may be processed within the scope described below. What should be understood from the concept of data controller is: Natural or legal person who determines the purposes and means of the processing of personal data, and who is responsible for establishment and management of the filing system.

You can use the following channels to contact the data controller:

Address : Boğazkesen Cad. Tomtom Kaptan Sok., No:18 Beyoğlu/İstanbul

Telephone : (212) 292 49 49

### ARTICLE 2: PROCESSED PERSONAL DATA AND PURPOSE OF PROCESSING PERSONAL DATA

The categories of personal data that belong to the visitor, product or service recipient (hereinafter referred to as the "customer"), employee candidate, employee, supplier employee and supplier representative and processed by us are listed below, and each data category is processed for the purposes stated opposite:

- a- Identity/ for visitors, creating and tracking visitor records, conducting communication activities for the customer, executing the application processes of the employee candidates for the candidates, fulfilling the obligations arising from the employment contract and legislation for the employees, managing the fringe benefits and benefits processes, goods for the supplier employee and service procurement processes, management of goods and service procurement processes for the supplier representative, and follow-up of legal affairs,
- b- Health information / creation and follow-up of visitor records for visitors, fulfillment of obligations arising from employment contracts and legislation for Employees, Performance of other services, Execution of activities in accordance with the legislation, Informing authorized persons, institutions and organizations, carrying out occupational health and safety activities,
- c- Philosophical beliefs, religions, sects and other beliefs/ creating and monitoring visitor records for visitors, conducting communication activities for the customer, fulfilling the obligations arising from the employment contract and legislation for the employees,
- d- Communication/execution of communication and accounting activities for customers, fulfillment of employment contract and regulatory obligations for employees, Execution of training activities, Planning of human resources processes, Providing information to authorized persons, institutions and organizations, Execution of management activities, purchasing goods and services for supplier employees and management of procurement processes, management of goods and service procurement processes for the supplier representative,
- e- Customer transaction/carrying out payment activities for customers, conducting communication activities, conducting surveys, performing other services, carrying out activities in accordance with the legislation,
- f- Personnel/ Carrying out the application processes for employee candidates, fulfilling the obligations arising from employment contracts and legislation for employees,
- g- Criminal conviction and security measures / Fulfillment of obligations arising from employment contracts and legislation for employees,
- h- Professional experience/ Fulfillment of obligations arising from employment contracts and legislation for employees,
- i- Other information/ Fulfillment of obligations arising from employment contracts and legislation for employees
- j- Finance/ Fulfilling the obligations arising from employment contracts and legislation for employees, executing finance and accounting works, managing the procurement of goods and services for the supplier officer,
- k- Legal action/ Fulfillment of obligations arising from employment contracts and legislation for employees
- l- Physical space security / Ensuring physical space security

### **ARTICLE 3: THE PARTIES THAT PERSONAL DATA MAY BE TRANSFERRED TO AND THE PURPOSE OF TRANSFER**

Of the personal data subject to this clarification text, those transferred for the purpose of fulfilling legal obligations, ensuring security and fulfilling obligations arising from employment contracts and legislation, and the places where these are transferred are listed below:

- a- Identity / General Directorate of Security, Judicial and Administrative Authorities, Social Security Institution, Financial Advisor, Legal Advisor (Lawyer)
- b- Health information/ Social Security Institution, Financial Advisor, Legal Advisor (Lawyer)
- c- Philosophical belief, religion, sect and other beliefs / Judicial and Administrative Authorities, Social Security Institution, Financial Advisor, Legal Advisor (Lawyer)
- d- Communication / Judicial and Administrative Authorities, General Directorate of Security, Social Security Institution, Financial Advisor, Legal Advisor (Lawyer)
- e- Personnel / General Directorate of Security, Real persons or legal entities of private law, Social Security Institution, Financial Advisor, Legal Advisor (Lawyer)
- f- Criminal conviction and security measures / Legal Advisor (Lawyer)
- g- Professional experience/Social Security Institution,
- h- Other information
- i- Finance/ Social Security Institution, Financial Advisor, Legal Advisor (Lawyer)
- j- Legal action/ Financial Advisor, Legal Advisor (Lawyer)
- k- Physical space security/ Judicial and Administrative Authorities as a Public Institution.

### **ARTICLE 4: PERSONAL DATA COLLECTION METHODS AND LEGAL REASONS**

Personal data belonging to the visitor, product or service buyer (hereinafter referred to as the "customer"), employee candidate, employee, supplier employee and supplier official are collected in the following ways:

- a- Personal data belonging to the employees, by submitting documents in physical and/or electronic media (via virtual methods such as e-mail).
- b- Physical submission of résumé and passport photo of the employee candidate, by the relevant person or by sending it via virtual methods such as e-mail.
- c- The personal data of the supplier's officials and employees is done by non-automatic methods.
- d- Personal data belonging to customers can be obtained by filling in a physical and/or electronic form and verbally declaring their personal data
- e- By verbally declaring personal data of visitors.

Legal reason for the collection and processing of personal data are provided in the following articles of this clarification text and it is necessary due to the necessity of;

For article 2/a; Data processing is mandatory for the legitimate interests of the data controller, obtaining explicit consent when necessary, processing of personal data belonging to the parties to the contract is necessary,

For articles 2/b, 2/c and 2/g; obtaining explicit consent,

For article 2/d; It is necessary to process data for the legitimate interests of the data controller, obtaining explicit consent when necessary, obtaining explicit consent, processing of personal data belonging to the parties to the contract is necessary,

For article 2/e; Data processing is mandatory for the legitimate interests of the data controller, obtaining explicit consent when necessary, processing of personal data belonging to the parties to the contract is necessary,

For article 2/f; It is necessary to process data for the legitimate interests of the data controller, the processing of personal data belonging to the parties to the contract is necessary,

For articles 2/h, 2/i, 2/j and 2/k; It is necessary to process the personal data of the parties to the contract,

For article 2/l; It is mandatory for the data controller to fulfill its legal obligation, and data processing is mandatory for the legitimate interests of the data controller.

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### ARTICLE 5: STORAGE PERIOD OF PERSONAL DATA

The storage periods of the personal data written in this clarification text according to the data categories are listed below and the personal data is destroyed at the end of the period.

- a- Identity / 1 year from the processing of the Data received from the Visitor / 20 years from the processing of the data received from the Customer / 10 years from the end of the employee's employment relationship / 10 years from the expiration of the supplier agreement / for the supplier representative, 10 years from the expiration of the supplier agreement
- b- Health information/ 1 year from the receipt of the data from the Visitor / 10 years from the end of the employee's employment relationship, the health report of the employees, at least 15 years from the end of the employment relationship
- c- Philosophical belief, religion, sect and other beliefs / 1 year from the processing of the data from the Visitor / 20 years from the processing of the data from the Customer / 10 years from the end of the employee's employment relationship
- d- Communication / 20 years from the receipt and processing of the data from the Customer / 10 years from the end of the employee's employment relationship / for the supplier employee, 10 years from the expiration of the supplier agreement / for the supplier representative, 10 years from the expiration of the supplier agreement
- e- Customer transaction / 20 years from the receipt and processing of the data from the Customer
- f- Personnel / 1 year from the processing of the data from the employee candidate / 10 years from the end of the employee's employment relationship
- g- Criminal conviction and security measures / 1 year from the end of the employee's employment relationship
- h- Professional experience / 10 years from the end of the employee's employment relationship
- i- Other information (Military status information) / 10 years from the end of the employee's employment relationship
- j- Finance/ 10 years from the termination of the employee's employment / for the supplier representative, 10 years from the expiration of the supplier agreement
- k- Legal Action / 10 years from the end of the employee's employment relationship
- l- Physical space security / 15 days
- m- Résumé / 1 year from obtainment

### ARTICLE 6: RIGHTS OF THE RELEVANT PERSON

The natural person whose personal data is processed is defined as the relevant person and has the following rights regarding himself/herself by applying to the workplace:

- a- Learning whether personal data is processed or not
- b- b- Requesting information about personal data if it has been processed
- c- Learning the purpose of processing personal data and whether they are used in accordance with the purpose
- d- Knowing the third parties to whom personal data is transferred domestically or internationally
- e- Requesting correction of personal data if it is incomplete or incorrectly processed
- f- Request deletion or destruction of personal data
- g- Requesting notification of the transactions made pursuant to subparagraphs (e) and (f) of this article to third parties to whom personal data has been transferred
- h- Objecting to the emergence of a result against the person him/herself by analyzing the processed data exclusively through automated systems
- i- Requesting the compensation of the damage in case of loss due to unlawful processing of personal data

Sincerely yours,

**AVEC TURİZM OTELCİLİK İNŞAAT TİCARET A.Ş.**