

PERSONAL DATA PROTECTION AND PROCESSING POLICY

1. PURPOSE AND SCOPE OF THE POLICY

This TSRA Training and Consultancy Company (hereinafter referred to as TSRA), PERSONAL DATA PROTECTION AND PROCESSING POLICY (hereinafter referred to as the Policy) has been prepared in order to determine the procedures and principles regarding the processing activities carried out by TSRA and the works and transactions regarding the protection of personal data being processed. As a result of the amendment made in 2010, the protection of personal data was guaranteed by the Constitution with the paragraph added to Article 20 of the Constitution and it was stipulated that the procedures and principles regarding the protection of personal data would be regulated by law. In this context, the Law on the Protection of Personal Data No. 6698 entered into force on 07.04.2016. First of all, on the protection of personal data, which is a constitutional right, TSRA makes this a company policy by organizing the necessary studies to raise awareness within the company and harmonizing the internal functioning with the personal data protection legislation. This Policy is intended to guide TSRA in terms of the implementation of the regulations set forth by the personal data protection law and the relevant legislation.

2. DEFINITIONS OF CONCEPTS

EXPLICIT CONSENT: Consent on a specific subject, based on information and expressed with free will.

ANONYMIZATION: Making personal data unable to be associated with an identified or identifiable natural person in any way, even by matching with other data.

PERSONAL DATA OWNER: A natural person whose personal data is processed. For example; Customers, employees.

PERSONAL DATA: Any information relating to an identified or identifiable natural person.

SENSITIVE PERSONAL DATA: Data related to race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, dress, membership to associations, foundations or unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data are sensitive data.

PROTECTION OF PERSONAL DATA: Obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic or non-automatic means, provided that it is a part of any data recording system.

DATA PROCESSOR: It is the natural and legal person who processes personal data on behalf of the data controller based on the authorization given by him.

DATA CONTROLLER: It is the natural and legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.

KVKK: Law No. 6698 on the Protection of Personal Data

3. RECORDING MEDIA OF PERSONAL DATA

Personal data is processed by TSRA through the following recording media.

- Servers
- Removable memories (USB, Memory Card, etc.)
- Information security devices (firewall, log file, antivirus, etc.)
- Personal computers
- Optical discs (CD, DVD, etc.)
- Printer, scanner, copier
- Software (office software, software belonging to government agencies)
- Mobile devices (phone, tablet, etc.)

- Non-electronic written, printed, visual media

4. EMPLOYEE and CANDIDATE GROUPS

4.1. Personal Data Collected Regarding the Candidate Person Group

TSRA, regarding the group of candidate persons who applied to it for job application; Identity Information, Contact Information, Professional Experience Information, Education Information, Visual Data Information, Name Surname, Date of Birth, Address, Telephone, E-mail, Military Status, Relative Information, Marital Status, Education Status, Professional Experience, Reference Information, Vocational Trainings, Duty, Photograph, TCKN, CV (prepared by him/her) Information is processed.

4.2. Personal Data Collected Regarding the Employee Person Group

TSRA, regarding the group of persons working for the reason and purpose of the performance of the employment relationship/employment contract; Identity Information, Contact Information, Legal Transaction and Compliance Information, Personal Information, Financial Information, Professional Experience Information, Employee Transaction Information, Photograph, Bank Account Information, Residence, Diploma Information, Vocational Education Information, Marriage Date, Spouse and child identity information, Military Discharge or status information, İşkur Registration Information, Reference Information, employment information are processed.

4.3. Purposes of Collecting and Processing Personal Data of Candidates

Taking into account the nature of the application, TSRA processes the personal data of the candidate for the purpose of Conducting Human Resources Processes:

- Bringing effective personnel into the organization
- To evaluate the candidate's qualification, experience, interest and suitability for the open position,
- If necessary, to check the accuracy of the information provided by the candidate or to contact third parties and conduct reference research about the candidate,
- To contact the candidate about the application and recruitment process or, if appropriate, to contact the candidate for any position later,
- To develop and improve the recruitment principles applied by the TSRA,

4.4. Purposes of Collecting and Processing Personal Data of Employees

TSRA processes the personal data of the employee group for the following purposes:

- To develop and improve the employment contract principles implemented by TSRA,
- Carrying out emergency processes,
- To be able to carry out audit ethical activities,
- To be able to carry out human resources processes,
- To be able to meet the demands of authorized public institutions or organizations in disputes that may arise or in a judicial case that may occur,
- In order to fulfill legal obligations regarding the employment of the employee,
- In order to open a salary account for the personnel, to provide a rental car when necessary, to provide a telephone, to provide a telephone line, to give a meal card, to carry out automatic private pension transactions,
- In order to monitor the health conditions necessary for the employee to fulfill his duties;
- In order to follow up the wage garnishments placed on the employee's salary,
- In order to ensure and audit TSRA's information security and privacy policies and standards in a healthy manner,
- In case of emergencies, in order to contact the persons given by the Employee with his own consent,
- In order to evaluate performance and determine wage policies,
- Fulfillment of the requirements determined by laws and regulations (tax legislation, social security legislation, law of obligations, commercial law legislation, occupational health and safety law, legislation on electronic communication, etc.)

- To carry out the activities that need to be done within the framework of occupational health and safety.

4.5. Methods of Collecting and Processing Personal Data of Employees and Candidates

During the recruitment process, the personal data of the candidates are collected together with or in addition to other methods and means specified in this Policy by the following methods and means:

- Application form published in printed or electronic environment,
- Resumes submitted by candidates to TSRA via e-mail.

TSRA processes the collected personal data through non-automated means through computer systems.

4.6. Conducting Reference Research on Candidates

TSRA can conduct reference research on the candidates with the information specified by the candidates in their job applications.

The reference research to be carried out will generally be aimed at confirming the accuracy of the information provided by the candidate and the intern. In addition, it will be among the objectives of the research to determine the information that the candidate and the intern keep about themselves and that may cause risks in terms of TSRA. The obligation to inform the persons to be contacted for the purpose of conducting a reference search will be fulfilled by the TSRA official at the time of the first communication. Within the scope of the reference research to be carried out, necessary personal data such as identity information, work and education experience of the candidates can be shared with third parties. In addition, personal data about interns and candidates can be obtained from third parties. Candidates can contact TSRA at any time about the reference search that will be carried out for them.

4.7. Rights of Employees and Candidates Regarding Personal Data

Article 11 of the Law on the Protection of Personal Data No. 6698 ("KVKK"). Candidates who want to exercise their rights arising from this article can apply to TSRA within the scope of the procedures and principles described in this Policy.

4.8. Personal Data Collected During the Candidacy Process to Be Processed in Case of Recruitment

All personal data collected and processed about the intern and the candidate during the recruitment processes are transferred to the personnel file if it is decided to employ the candidate in the relevant open position.

4.9. Security of Personal Data of Employees and Candidates

TSRA does not discriminate between groups of data subjects (such as candidates, interns) in terms of the security of the personal data it processes. Detailed information about the security of personal data can be found in the section of this document on the security of personal data.

5. CUSTOMERS & SUPPLIERS

5.1. Personal Data Collected About Customers

Although it may vary depending on the service provided by TSRA to the customer; Your personal data are processed verbally, in writing or electronically, provided by TSRA and during your use of TSRA services:

- Name and Surname
- Address
- Phone
- Email
- Education
- TCKN
- Bank IBAN Number Information (When required in payment transactions)
- Billing Information

5.2. Personal Data Collected Regarding the Supplier or Supplier Employee

Although it may vary depending on the service, product or commercial activity received by TSRA; Your personal data listed below are processed verbally, in writing or electronically, provided by TSRA and for the purpose of operating TSRA business processes:

- Name and Surname
- Telephone number
- Address
- E-mail address
- Signature
- Bank Account Information

5.3. Purposes of Collecting and Processing Customers' and Supplier or Supplier Employee Data

TSRA processes the customer's personal data for the following purposes, taking into account the business relationship between the service provided to the customer and the customer:

- Increasing the effectiveness of the service received by the customer
- Making use of data for sending Waybill Invoices
- To use it for dispute resolution in any dispute
- Execution of Activities in Accordance with the Legislation
- Execution of Service After-Sales Support Services
- Execution of Service Sales Processes
- Execution of Service Procurement Processes
- Execution of Service Production and Operation Processes

5.4. Methods of Collecting and Processing Personal Data of Customers and Supplier Employees/Officials

Personal data of Customer and Supplier Employees/Officials may be collected together with or in addition to other methods and means specified in this policy by the following methods and means: Electronically via the website and by e-mail.

5.5. Rights Regarding Personal Data of Customers and Supplier Employees/Officials

Customer and supplier employees/officials who want to exercise their rights arising from the Personal Data Protection Law No. 6698 ("KVKK") can apply to TSRA within the scope of the procedures and principles described in this policy.

6. PRINCIPLES REGARDING THE PROCESSING OF PERSONAL DATA

TSRA shows special sensitivity to the protection of personal data as a company policy and acts in the light of the following basic principles in this direction.

6.1. Processing in Accordance with the Law and the Rule of Good Faith

In the processing of personal data, we act in accordance with the principles introduced by legal regulations and the general rule of trust and honesty.

6.2. Ensuring that Personal Data is Accurate and Up-to-Date When Necessary

Periodic checks and updates are carried out to ensure that the processed personal data of the groups of persons is accurate and up-to-date, and necessary measures are taken in this direction. In this context, systems for checking the accuracy of personal data and making necessary corrections are established within TSRA.

6.3. Processing for Specific, Explicit, and Legitimate Purposes

Personal data is processed based on explicit, specific and legitimate data processing purposes. The purpose for which the data will be processed is given in detail below.

6.4. Being Relevant, Limited and Proportionate to the Purpose for which they are Processed

Personal data is processed in a measured, purpose-related and limited manner in order to achieve the envisaged purpose(s), and the processing of personal data that is not related to the realization of the purpose or is not needed is avoided.

6.5. Retention for the Period Stipulated in the Relevant Legislation or Required for the Purpose for which they are Processed

TSRA retains personal data only for the period stipulated in the relevant legislation or required for the purpose for which they are processed. In this context, first of all, it is determined whether a period of time is stipulated for the storage of personal data in the relevant legislation, if a period is determined, this period is complied with, and if a period is not determined, personal data is stored for the period required for the purpose for which they are processed. In the event that the period expires or the reasons requiring its processing disappear, personal data is deleted, destroyed or anonymized in accordance with TSRA's Personal Data Storage and Destruction Policy, unless there is a legal reason that allows them to be processed for a longer period of time.

7. CONDITIONS FOR PROCESSING PERSONAL DATA OF GROUPS OF PERSONS

The explicit consent of the relevant groups of persons is only one of the reasons for compliance with the law that makes it possible to process personal data in accordance with the law. Apart from explicit consent, personal data may also be processed in the presence of one of the other reasons for compliance with the law listed below. The basis of the personal data processing activity may be only one of the reasons for compliance with the law stated below, or more than one of these conditions may be the basis of the same personal data processing activity. If the processed personal data is sensitive personal data; The conditions under the heading "Cases in which Sensitive Personal Data Can Be Processed" are applied below. Groups of persons are informed about which personal data are processed with this Policy, for what purposes and for what reasons their personal data is processed, from which sources their personal data is collected, with whom this personal data will be shared and how it will be used.

7.1. Clearly Stipulated in the Laws

In cases where the processing of personal data is expressly stipulated in the laws, TSRA processes the personal data of the groups of persons whose data will be processed without obtaining the explicit consent of the groups of persons whose data will be processed. For example, in accordance with the Law on the Regulation of Electronic Commerce, processing of personal data in processes such as membership, issuance of commercial electronic permission, order, payment, delivery, cancellation or return of the product.

7.2. Failure to Obtain the Explicit Consent of the Person Concerned Due to Actual Impossibility

In the event that it is necessary to process personal data in order to protect the life or bodily integrity of a group of persons who are unable to disclose their consent due to actual impossibility or whose consent cannot be validated, their data may be processed without the explicit consent of the group of persons.

7.3. Being Directly Related to the Establishment or Performance of the Contract

Provided that it is directly related to the establishment or performance of a contract, data may be processed if it is necessary to process personal data belonging to the parties to the contract.

7.4. TSRA's Fulfillment of Its Legal Obligation

If processing is mandatory in order to fulfill legal obligations as a data controller, the personal data of the group of persons may be processed without explicit consent.

7.5. Publicization of Personal Data by Groups of Persons

If the personal data of the person group has been made public by the person group, the data may be processed without the need for explicit consent. For example, personal data shared publicly by the

Member on the internet and social media accounts may be processed if it is in accordance with and to the extent of this sharing will.

7.6. Data Processing is Mandatory for the Establishment or Protection of a Right

If data processing is mandatory for the establishment, exercise or protection of a right, the data may be processed without the explicit consent of the person group. For example, based on a complaint made by the Member to the court, his information is included in this complaint file.

7.7. Processing of Data Based on Legitimate Interest

Provided that it does not harm the fundamental rights and freedoms of the person group, if data processing is mandatory for the legitimate interests of TSRA, personal data may be processed without the explicit consent of the person group. For example, conducting satisfaction surveys by TSRA to ensure customer satisfaction.

7.8. Processing of Personal Data of the Person Group Based on Explicit Consent

The personal data of the group of persons will be processed on the basis of explicit consent, where it cannot be processed on the basis of any of the conditions set out in clause 5(2) above.

8. CASES IN WHICH SENSITIVE PERSONAL DATA MAY BE PROCESSED

Some of the personal data is regulated separately as "sensitive personal data" and is subject to special protection.

8.1. Processing of Sensitive Personal Data Based on Explicit Consent

Sensitive personal data can be processed by taking the principles specified in this Policy and the necessary administrative and technical measures, if the person group has explicit consent.

8.2. Cases Where Sensitive Personal Data Can Be Processed Without Explicit Consent

In cases where there is no explicit consent of the person group, sensitive personal data may be processed in the following cases, provided that adequate measures to be determined by the Personal Data Protection Board ("Board") are taken:

- Sensitive personal data other than the health and sexual life of the person group, in cases stipulated by law,
- Sensitive personal data regarding the health and sexual life of the person group can only be used by persons or authorized institutions and organizations under the obligation of confidentiality for the purpose of protecting public health, conducting preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

9. ENLIGHTENMENT AND INFORMING THE GROUP OF PEOPLE

During the acquisition of personal data, the group of persons is informed by TSRA. In this context, the identity of the TSRA contact person, the purpose for which the personal data will be processed, to whom and for what purpose the processed personal data can be transferred, the method and legal reason for collecting personal data and the rights of the groups of persons are informed to them. Information is provided if groups of persons request information about their personal data.

10. CATEGORIZATION OF PERSONAL DATA

Within the scope of this POLICY, the following categories of personal data of groups of persons are processed by TSRA:

- Credential
- Contact Information
- Customer Transaction Information
- Transaction Security Information

- Financial Information
- Profession Experience Information

11. PURPOSES OF PROCESSING PERSONAL DATA

11.1. Conditions of Processing

Personal data is processed limited to the following conditions. These conditions are;

- The relevant activity regarding the processing of your personal data is clearly stipulated in the laws,
- The processing of your personal data by TSRA is directly related and necessary for the establishment or performance of a contract,
- The processing of personal data is mandatory for TSRA to fulfill its legal obligations,
- Provided that the personal data has been made public by the person group; processed by TSRA in a limited manner for the purpose of making it public,
- The processing of personal data by TSRA is mandatory for the establishment, exercise or protection of the rights of TSRA or groups of persons or third parties,
- Provided that it does not harm the fundamental rights and freedoms of groups of persons, it is obligatory to carry out personal data processing activities for the legitimate interests of TSRA,
- The processing of personal data by TSRA is mandatory for the protection of the life or physical integrity of the person concerned or someone else, and in this case, the person concerned is unable to disclose his consent due to actual impossibility or legal invalidity.
- In the absence of the above-mentioned conditions; In order to carry out personal data processing activities, TSRA applies to the explicit consent of personal data owners.

11.2. Processing Purposes

TSRA personal data; It operates for the following purposes:

For the Candidate-Employee Group:

- To be able to carry out recruitment processes,
- Evaluation of candidates,
- To be able to make performance evaluation,
- Determining whether he/she is competent to fulfill the requirements of the job continuously,
- To be able to carry out general insurance, private insurance and other transactions of persons working within the framework of the employment contract,
- Managing fringe benefit processes, performing periodic health checks, entering and exiting work,
- Carrying out legal proceedings

For the Customer Group:

- Evaluation of the suggestion and request forms filled in by the customer in line with the request and development of the business.
- Performing the services provided to customers in a healthy way.
- Carrying out legal proceedings

For the Online Visitor:

- Compliance with legal regulations.
- Logging of system movements of online visitors and users.

For Shareholder/Partner:

- Provision of information and documents that may be needed in the management of legal and administrative processes.

12. TRANSFER OF PERSONAL DATA TO DOMESTIC AND/OR FOREIGN THIRD PARTIES

Personal data belonging to the group of persons can be transferred to third parties (third-party companies, third real persons) by taking the necessary security measures in line with the purposes of processing.

12.1. Transfer of Personal Data

Personal data may be transferred to third parties if the conditions stipulated in Article 8 and Article 9 of the KVKK are met.

Anonymous information and site usage habits of online visitors who are not members of the site can be collected and shared with cookies.

12.2. Third Parties to whom Personal Data is Transferred and Purposes of Transfer

Your personal data may be transferred to the following groups of data subjects:

- Business partners (Independent Auditors, contracted insurance companies),
- Internal audit
- Legally authorized public institutions and organizations,
- Legally authorized private law persons (Company Lawyer / Legal Advisor, Workplace Physician).
- Your personal data is transferred for the following purposes:
 - Developing and improving the employment contract principles implemented by TSRA,
 - Carrying out emergency processes,
 - To be able to meet the demands of authorized public institutions or organizations in disputes that may arise or in a judicial case that may occur,
 - To evaluate performance and determine wage policies.

13.SECURITY OF PERSONAL DATA

In order to ensure the security of personal data, reasonable measures are taken to prevent unauthorized access risks, accidental data loss, deliberate deletion of data or damage to data. All necessary technical and physical measures are taken to prevent access to personal data by anyone other than those authorized to access it. In this context, the authorization system is designed in such a way that it is not possible for anyone to access more personal data than necessary. While ensuring the security of sensitive personal data such as health data, stricter measures are taken compared to other personal data. Authorized persons are subjected to the necessary security checks. In addition, these people are trained on their duties and responsibilities. Access records to personal data are kept to the extent that technical possibilities allow, and these records are reviewed at regular intervals. In case of unauthorized access, an investigation is initiated immediately. TSRA complies with the following obligations in order to ensure the security of the processed data:

- Acting in accordance with the law and honestly in matters related to the protection of personal data,
- Accurate, complete and complete processing of personal data,
- To carry out the necessary work in order to update the personal data that is out of date,
- Informing the relevant manager when it notices any illegality in the processing of personal data,
- To make the necessary directions for the exercise of legal rights regarding personal data.

14.LEGAL RIGHTS OF GROUPS OF PERSONS AND METHODS OF USE

14.1. Rights Regarding Personal Data within the Scope of KVKK

The rights that groups of persons can exercise regarding personal data are included in Article 11 of the KVKK and are as follows:

- To learn whether personal data is processed or not,
- If personal data has been processed, requesting information about it,
- To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- To know the third parties to whom personal data is transferred in the country or abroad,

- Requesting correction of personal data in case of incomplete or incorrect processing,
- Requesting the deletion or destruction of personal data within the framework of the conditions stipulated in the relevant legislation,
- Requesting notification of the transactions made pursuant to subparagraphs (d) and (e) to third parties to whom personal data has been transferred,
- Objecting to the occurrence of a result against the person himself by analyzing the processed data exclusively through automated systems,
- Requesting the compensation of the damage in case of damage due to unlawful processing of personal data.

14.2. Principles Regarding the Exercise of Rights Regarding Personal Data

In order to exercise their rights regarding personal data, individuals will be able to apply by sending an e-mail using the e-mail address registered in TSRA systems. Applications made in this way will be answered within 30 days at the latest.

15. ENFORCEMENT AND UPDATABILITY

This Policy entered into force on the date of publication. The policy may be updated to comply with changing conditions and legislation. Information about the relevant update will be provided on the institution's website.