

[AÇIK]



# PERSONAL DATA PROTECTION AND PROCESSING POLICY

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## 1. PURPOSE

TRB 360("TRB 360") shows utmost sensitivity to the processing and protection of personal data in accordance with Law No. 6698 on the Protection of Personal Data ("Law"). For this reason, great importance is attached to the protection of your personal data during all planning and activities carried out at TRB 360. In this context, with full awareness of our responsibility, your personal data is protected in accordance with this Personal Data Protection and Processing Policy ("Policy").

The main purpose of this policy is to provide explanations about the systems for the processing and protection of personal data in accordance with the law and the purpose of the Law and to inform the persons whose personal data are processed by TRB 360 in this context. In this way, it is aimed to ensure full compliance with the legislation in the processing and protection of personal data carried out by TRB 360 and to protect all rights of personal data subjects arising from the legislation on personal data.

## 2. SCOPE

This Policy has been prepared for the persons whose personal data are processed by TRB 360 through automatic or non-automatic means provided that they are part of any data filing system.

## 3. DEFINITIONS

Table 1. Definitions

Definition	Explanation
<b>Explicit Consent</b>	Consent about a specific subject is based on information and expressed in free will.
<b>Anonymization of Personal Data</b>	Rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data.
<b>Personal Data</b>	Any information relating to an identified or identifiable natural person.
<b>Processing of Personal Data</b>	Any operation that is performed on personal data, wholly or partially by automated means or non-automated means provided that form part of a data filing system, such as collection, recording, storage, protection, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization, preventing the use thereof.
<b>Board</b>	Personal Data Protection Board
<b>Special Categories of Personal Data</b>	Personal data relating to race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations, or trade unions, data concerning health, sexual life, criminal convictions, and security measures, and the biometric and genetic data are deemed to be special categories of personal data.

<b>Policy</b>	TRB 360 Personal Data Protection and Processing Policy.
<b>Data Processor</b>	The natural or legal person who processes personal data on behalf of the data controller upon its authorization.
<b>Data Controller</b>	The data controller is the person who determines the purposes and means of processing personal data and manages the place where the data is kept systematically (data filing system).

#### 4. ABBREVIATIONS

Table 2. Abbreviations

Abbreviation	Explanation
<b>REM</b>	Registered Electronic Mail
<b>PPD</b>	Protection of Personal Data

#### 5. REFERENCES AND RESOURCES

Table 3. References and Resources

Reference/Resource Number	Reference/Resource Name
6698	Personal Data Protection Law
-	Regulation on the Deletion, Destruction, or Anonymization of Personal Data
-	Communique on Principles and Procedures to be Followed in Fulfillment of the Obligation to Inform
-	Communique on the Principles and Procedures for the Request to Data Controller

## 6. Processing and Transferring Personal Data

### 6.1. General Principles for Processing Personal Data and Special Categories of Personal Data

TRB 360 processes Personal Data in accordance with the procedures and principles stipulated in the Law and this Policy. TRB 360 acts in accordance with the principles listed in the Law when processing personal data.

### 6.2. Conditions for Processing Personal Data and Special Categories of Personal Data

TRB 360 processes Personal Data in accordance with the conditions set forth in the Law. TRB 360 takes the measures determined by the Personal Data Protection Authority.

### 6.3. Conditions for Transferring Personal Data Domestically and Abroad

TRB 360 acts in accordance with the conditions and principles stipulated in the Law regarding the transfer of Personal Data. TRB 360 may transfer all Personal Data, including Special Categories of Personal Data, to third parties in accordance with the Law by taking the necessary security measures in line with the purposes of processing Personal Data.

## 7. Categories of Personal Data, Purposes of Processing and Transferring Personal Data, and Persons to whom Personal Data will be Transferred

### 7.1. Categories of Personal Data

TRB 360 processes the Personal Data specified below in accordance with the personal data processing conditions set forth in the Law.

Table 4. Categories of Personal Data

PERSONAL DATA	SCOPE
<b>Family Members and Relatives Information</b>	Information about the family members, relatives, and other persons who can be reached in case of emergency of the personal data subject, which clearly belongs to an identified or identifiable natural person; processed partially or completely automatically or non-automatically as part of the data filing system; within the framework of the business and transactions carried out by TRB 360 or in order to protect the legal or other interests of TRB 360 or the personal data subject
<b>Criminal Conviction and Security Measures Information</b>	Information on criminal convictions, information on security measures, which clearly belongs to an identified or identifiable natural person; processed partially or completely automatically or non-automatically as part of the data filing system
<b>Finance Information</b>	Personal data that clearly belongs to an identified or identifiable natural person; processed partially or completely automatically or non-automatically as part of the data filing system; personal data processed regarding information, documents, and records showing all kinds of

	financial results created according to the type of legal relationship TRB 360 has established with the personal data subject and information such as customer number, IBAN
<b>Physical Space Security Information</b>	Information that clearly belongs to an identified or identifiable natural person; processed partially or completely automatically or non-automatically as part of a data filing system; such as camera recordings taken at the entrance to the physical space, during the stay in the physical space and records taken at the security point
<b>Audio and Visual Recordings Information</b>	Data in the form of photographs, camera or sound recordings, and copies of documents containing personal data, which clearly belong to an identified or identifiable natural person
<b>Legal Transaction Information</b>	Data processed within the scope of TRB 360's legal obligations with the determination of all legal rights
<b>Contact Information</b>	Information such as telephone number, address, e-mail address, and IP address, which clearly belongs to an identified or identifiable natural person; processed partially or completely automatically or non-automatically as part of the data filing system
<b>Transaction Security Information</b>	Personal data processed regarding the technical, administrative, financial, legal, or commercial security of the personal data subject or TRB 360
<b>Identity Information</b>	Data that clearly belongs to an identified or identifiable natural person; processed partially or completely automatically or non-automatically as part of the data filing system; containing information about the identity of the person. Information such as driver's license, SSI number, and signature including information such as name-surname, Turkish ID Number, nationality, mother's and father's name, place of birth, date of birth, gender
<b>Professional Experience Information</b>	Diploma information, courses attended, vocational training information, certificates, and transcript information, which clearly belongs to an identified or identifiable natural person; processed partially or completely automatically or non-automatically as part of the data filing system
<b>Customer Transaction Information</b>	Records regarding the use of TRB 360 products and services and information containing instructions and

	requests necessary for the customer's use of products and services
<b>Personal Information</b>	All kinds of personal data that clearly belong to an identified or identifiable natural person; processed partially or completely automatically or non-automatically as part of the data filing system; process for obtaining information that will be the basis for the formation of the personal rights of natural persons who are in a business relationship with TRB 360
<b>Health Information</b>	Information on disability status, blood group information, personal health information, device and prosthesis information used, which clearly belongs to an identified or identifiable natural person; processed partially or completely automatically or non-automatically as part of the data filing system

## 7.2. Purposes of Processing and Transferring Personal Data

Personal Data is processed by TRB 360 for the purposes listed below but not limited to these and in accordance with the principles and conditions listed in the Law:

- Planning and implementation of human resources policies,
- Fulfillment of the obligations required by the relevant law, regulation, purchase order, or contract in a complete and accurate manner,
- Planning, executing, and managing commercial partnerships and strategies,
- Ensuring corporate functioning, planning, executing, and managing management and communication activities,
- Ensuring the highest level of data security,
- Planning, execution, and management of relations with suppliers and other stakeholders,
- Planning, execution, and management of recruitment processes,
- Execution and follow-up of all legal processes,
- Informing authorized institutions and organizations,
- Protection of the legitimate interest of the company,
- Security of Data Controller operations,
- Legitimate interest of the company,
- Ensuring company security in accordance with the Facility Private Security Law and Regulation
- Execution of Communication Activities
- Conducting Audit / Ethics Activities,
- Execution / Supervision of Business Activities Management of goods and service procurement processes
- Execution of Customer Relationship Management Processes,
- Execution of Activities for Customer Satisfaction,
- Organization and Event Management Execution of Employee Benefits and Benefits Processes
- Execution of risk management processes,
- Execution of information security processes,
- Execution of access authorizations,

- Keeping entrances and exits under control and preventing unauthorized entries

### 7.3. Persons to whom Personal Data will be Transferred

Personal Data may be transferred by TRB 360 to TRB 360 shareholders, suppliers, Public Institutions, Organizations, and third parties to the extent relevant, in accordance with the conditions and principles stipulated in the Law.

## 8. Method and Legal Reason for Collecting Personal Data, Disposal Process, and Storage Period

### 8.1. Personal Data Collection Method and Legal Reason

Personal data are collected and processed by TRB 360 through all kinds of verbal, written, and electronic media and methods in order to realize the purposes set forth in the Policy or in line with legal rights and responsibilities.

### 8.2. Disposal of Personal Data

Although TRB 360 has processed Personal Data in accordance with the provisions of the Law on the Protection of Personal Data and other legislation, in the event that the reasons requiring its processing disappear, TRB 360 disposes of Personal Data ex officio or upon the request of the data subject in accordance with the principles and conditions specified in the Law. The procedures and principles regarding the disposal of Personal Data are regulated in the TRB 360 Personal Data Storage and Disposal Policy.

### 8.3. Storage Period of Personal Data

TRB 360 stores Personal Data for the periods stipulated in the legal regulations or for the period determined by the company in the Personal Data Inventory. In case the period expires, these data shall be disposed of by TRB 360. The procedures and principles regarding the storage periods of Personal Data are regulated in the TRB 360 Personal Data Storage and Disposal Policy.

## 9. Rights of the Personal Data Subject, Exercise, and Evaluation of Rights

### 9.1. Informing the Personal Data Subject

TRB 360 informs the Personal Data Subjects in line with the procedures and principles set out in Law No. 6698 regarding the purpose, procedure, and principles of processing personal data, as well as its storage and disposal. TRB 360 has prepared clarification texts regarding the Processing of Personal Data and necessary procedures have been carried out in a manner accessible to the relevant parties.

### 9.2. Rights of the Personal Data Subject Listed in the Law

The information made by TRB 360 regarding the purpose, procedure, and principles of processing, storage, and disposal of personal data also includes the rights of the personal data subject arising from the Law.

### 9.3. Exercising the Rights of the Personal Data Subject

Under paragraph 1 of Article 13 of the Law titled "Application to the Data Controller", you may submit all your requests to TRB 360 in writing or by other methods determined by the Personal Data Protection Authority. Within this framework, the channels and procedures to submit your application to TRB 360 are explained below.

In order to exercise your rights, you can submit your request, which includes the information necessary to make your identity specific and understandable and your explanations regarding the right you request to exercise among the rights specified in Article 11 of the Law, by filling out the TRB 360 PDP Application Form. You can send a signed copy of the form to the e-mail address "info@trb360.com" or to the address TRB 360 Kızılırmak, 1450. Sk. No: 5 Floor: 13, 06510 Çankaya/Ankara – Turkey by hand with documents identifying your identity, you can send it via notary public or other



methods specified in the Personal Data Protection Law No. 6698 or you can send the relevant form to TRB 360's REM address TRB 360@hs03.kep.tr with a secure electronic signature.

#### 9.4. Procedure and Period for TRB 360 to Respond to Applications

TRB 360 finalizes the requests in the application free of charge as soon as possible, within 30 (thirty) days at the latest, depending on the nature of the request. If the transaction in question requires an additional cost, the fee in the tariff determined by the Personal Data Protection Authority may be charged. TRB 360 may accept the request or reject it by explaining its reasoning. It notifies its response in writing or electronically. If the request in the application is accepted, TRB 360 fulfills the requirements of the request.

#### 9.5. Personal Data Subject's Right to File a Complaint to the Personal Data Protection Authority

In cases where the application is rejected, the answer is found insufficient or the application is not responded to in due time; the data subject has the right to file a complaint to the Personal Data Protection Authority within thirty days from the date of learning the answer or within 60 (Sixty) days from the date of application.

## 10. Update, Compliance, and Changes

TRB 360 reserves the right to make changes to this Policy and other policies linked and related to this Policy.