

## ENLIGHTENMENT FORM REGARDING THE MANAGEMENT OF PERSONAL DATA (WORKER CANDIDATE)

### IN PURSUANT TO THE LAW NO. 6698 OF THE PROTECTION OF PERSONAL DATA ("PDPL")

#### Madde 1 – Identity of The Data Controller

**1.1.** TRB 360 (Will be shortly referred to as "TRB 360" or "Company" hereinafter.) bears the title of "Data Controller" and performs the necessary adaptational work to fulfil the responsibilities that arise from this role. This enlightenment text includes our explanations on how we process your data, types of data processed, the causes for processing data, the transfer/sharing of the data to institutes and organizations as necessary, the physical or electronic environments where the data is held and how the data is protected where the data in question is held within our company under the scope of the business relations established with TRB 360's candidate workers under Law (includes candidate Intern's), this document is to be updated by TRB 360 when necessary and published in up-to-date form.

#### Madde 2 – The Management of Your Personal Data and the Types of Data Processed

**2.1.** Under the No. 6698 Law of the Protection of Personal Data ("Law") and the laws and manners foreseen in relevant legislations, TRB 360 will be able to collect and process the following data belonging to Candidate Workers.

**2.2.**

Type of Data Processed	Channels of Attainment	Causes for Processing	Legal Justification
<b>Under the work done at TRB 360 we process the following data:</b> <ul style="list-style-type: none"> <li>- Name, Surname</li> <li>- Nationality</li> <li>- Photo</li> <li>- Copy of Identity Card</li> <li>- Address of Residence</li> <li>- Phone Numbers</li> <li>- E-mail Addresses</li> <li>- Driver License Data</li> <li>- Educational Info</li> <li>- Info on Past Jobs</li> <li>- Health Data</li> <li>- Gender</li> <li>- Reference Information</li> <li>- Marital Status</li> <li>- Audio and Visual Recordings Obtained via Closed Circuit Security Camera Systems (CCTV)</li> <li>- Face Recognition</li> </ul>	<ul style="list-style-type: none"> <li>- The CV provided to the Company by the Worker</li> <li>- Educational Data provided to the Company by the Worker</li> <li>- Other documents provided to the Company by the Worker</li> <li>- The Application Form provided to the Company by the Worker</li> <li>- Closed Circuit Security Camera Systems (CCTV)</li> </ul>	<ul style="list-style-type: none"> <li>- For the fulfilment of responsibilities arising from the Business Contract of the Worker and the Legislation, the processing of the job application processes of the Workers, the processing of Worker Satisfaction and Connection, the Processing of the Pricing Policy</li> <li>- Manifestation of Contract Proceedings</li> <li>- Orchestration of Storage and Archiving Activities</li> <li>-The Execution of Performance Evaluation Processes</li> </ul>	<ul style="list-style-type: none"> <li>- The fulfilment of responsibilities arising from No. 4857 Labor Law</li> <li>- The fulfilment of responsibilities arising from Social Insurance and General Health Insurance Act No. 5510</li> <li>- The fulfilment of responsibilities arising from Occupational Health and Safety Law No. 6331</li> <li>- Legitimate Interests</li> </ul>

#### Article 3 – To Whom and Why The Processed Data May Be Transferred

**3.1.** Your personal data may be processed in a way that is appropriate to the PDPL by the data controller or the legal/real person(s) chosen by the data controller under the conditions specified below,

For the fulfilment of our legal responsibilities arising from No. 4857 Labor Law, No. 6098 Turkish Code of Obligations, No. 6698 Law of the Protection of Personal Data and responsibilities from other relevant primary and/or secondary legislations,

Your personal data may be transferred to authorized Public Institutes and Organizations for the purpose of public and private legal procedures according to the purposes and legal reasons specified above.

The fulfilment of our responsibilities in all judicial proceedings including the signing of the business contract.

The creation, putting forth and defending of legal requests

The management and evaluation of the employment process

The planning of the performance evaluation processes and pricing of Worker Candidates

Control of access to buildings due to security concerns

The enabling of entry and exits to the Workplace and its branches

For the purpose of contacting persons provided by the worker in the presence of emergency situations

For the purpose of recording camera visuals due to privacy and security applications of the Workplace

For the purpose of fulfilling legal responsibilities as specified in the PDPL

To benefit from promotions and campaigns

For TRB 360'S quality, information security and privacy policy standards to be executed and supervised properly

The fulfilment of the requests of public institutions and organizations as necessitated by legal regulations

For the analysis of violations/suspected violations of the conduct of the Company and the Law and the taking of action towards these ends, the utilization of hardware and software provided by the company and/or the analysis of communications done in relation to the Company

For 3 (three) years upon submission, TRB 360 may process your collected and processed or yet to be processed personal data to maintain business relations and your personal data will be updated through either your or TRB 360's inquiry against the possibility of this data to change with time.

**3.2.** Your personal data may be transferred to authorized Public Institutes and Organizations for the causes and judicial necessities as clarified above for the execution of judicial proceedings of public nature. Your personal data is not transferred abroad. It is held in our domestic servers.

#### **Article 4 – The Methods of Collecting Personal Data and Legal Justification**

**4.1.** In case judicial relations are established, personal data can be attained through camera systems that remain active for 7 days and 24 hours. PDPL informative visuals are located in Workplace divisions equipped with camera systems. A link to this layered enlightenment text is shared within the visual.

**4.2.** In pursuant to the provision located in article No. 5 of the PDPL, personal data cannot be processed without the direct consent of the relevant person. The law has clarified special circumstances where direct consent will not be sought. Your personal data may be processed without seeking direct consent in the case that an explicit provision is present in the Law, as long as it is directly related to the enactment or completion of a contract, that it is necessary for the personal data of contracting parties to be processed, that it is mandatory for the fulfilment of the company's judicial responsibilities, that it is made public by the person in question themselves, that it is necessary to process data for the establishment, utilization or protection of a right and under the condition that the fundamental rights and freedoms of the relevant person are not damaged.

**4.3.** For TRB 360 to be able to proceed with its operations, personal data may be processed on the basis and procedures foreseen in the other related legislations and with regard to the causes and conditions for processing personal data as stated in articles 5. and 6. of the PDPL in order to fulfil the causes specified in this Enlightenment text and for the fulfilment of the judicial responsibilities specified above.

#### **Article 5 – The Storage Period and the Privacy of your Personal Data**

**5.1.** Your personal data will be stored for 3 (three) years upon the termination of your business contract. You can withdraw the permission that you have granted for the processing of your personal data besides from personal data which has to be processed by law.

**5.2.** TRB 360 is responsible for taking all sorts of necessary judicial, technical and executive precautions in ensuring an appropriate level of security to prevent the unlawful processing and access to personal data and to ensure that the data is guarded.

**5.3.** It is important for your personal data to be correct and up-to-date. You bear the responsibility to immediately get in touch with the Human Resources Department if any information is incorrect or outdated. The Company will fix, update, delete or remove the data in question.

#### **Article 6 - Your rights over your personal data under the scope of the Law No. 6698**

**6.1.** Know whether any of your personal data has been processed, request information regarding activities in which your data has been processed, know why your personal data is being processed, know the domestic or foreign third parties who have received your data, request for your personal data to be edited if it has been processed inadequately or incorrectly, ask for the data to be deleted or obliterated if the causes for the processing of the data are no longer valid or if the Company does not have a legal basis or legitimate interests to maintain the data, request for the Company to ensure that third parties who were authorized by the Company to process your personal data respect your rights with in line to this section, object to adverse outcomes caused by the processing of personal data through automatic systems and request for any harm caused by the unlawful processing of your personal data to be resolved.

**6.2.** You can communicate your questions regarding your rights over the processing of your Personal Data to the relevant company official in written form.

**6.3.** Requests made in relation to your personal data will be answered through the instrument of your inquiry after a maximum period of 30 days after it reaches us.

#### **Article 7 – Your Responsibilities**

**7.1.** You must ensure that all personal data that you have access to is processed in line with the Law and other legal legislations. This responsibility is shared equally by the Company's workers/worker candidates and the third parties who have their data processed. You must not use the personal data in question for purposes other than the causes created by your service relationship with the Company and the measurements required by these causes. (Know that disregarding this is not only a violation of the Law but also a violation of your Business Contract.)

**7.2.** In the case that you provide us with the information of a third person (for example; the contact information of someone to be contacted in case of emergency), you are considered to have accepted that the person in question has provided you with direct consent for their data to be processed in scope of the Law, that the necessary enlightenment was provided to them and that they have accepted the privacy notices in advance.

*With regard to the information above;*

*I have read and understand* ☐

*Worker*

*Name/Surname :*

*Signature :*

*Date :*

**APPROVAL FORM REGARDING THE MANAGEMENT OF PERSONAL DATA (WORKER CANDIDATE)****IN PURSUANT TO THE LAW NO. 6698 OF THE PROTECTION OF PERSONAL DATA ("PDPL")**

*I hereby accept, declare and pledge that I consent to the highlighted articles without any outer influence and permit the collection, management and the transfer of my Personal Data and Sensitive Personal Data throughout the period set by law according to the causes, scope and categories specified in The Enlightenment Form Regarding the Processing of Personal Data in pursuant to the No. 6698 Law On The Protection of Personal Data, that I have been informed regarding my rights by the above Enlightenment Text and that the data provided by my side to the Company is correct, complete and truthful and that I will immediately notify TRB 360 Information Technologies Inc. if any changes take place with this information:*

*With regard to the information above;*

*I have read and understand* ☐

*I accept and undertake* ☐

*Worker*

*Name/Surname :*

*Signature :*

*Date :*