

	EMPLOYEE DISCLOSURE TEXT	Document No:	KVK.F002
		Effective Date:	01.10.2021
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This Disclosure Text has been prepared by VBT Yazılım A.Ş. ("Company"), the Data Controller residing at QUICK TOWER, İçerenköy Mh. Umut Sk. No:10-12 K:13 D:57-60 PK:34752 Ataşehir/İstanbul, to inform its employees and to fulfil the Disclosure Obligation within the scope of the Personal Data Protection Law No. 6698 (KVKK) and other relevant legislation.

Our Company's Policies and Disclosure Texts regarding the Protection of Personal data are available at [VBT Software - Ethical Principles and Policies](#)


1. PERSONAL DATA COLLECTION METHODS AND LEGAL REASONS

Your personal data specified below, are collected in accordance with the relevant legislation through the following methods;

- By E-mail
- Through Cameras
- In writing
- Official Documents
- Physically (in person)
- Written Forms (company's printed forms)
- Written Form
- Through Personal Attendance System (PDKS)
- Through the Company's Website
- Verbally
- By Phone
- Electronic Forms (in-company software forms)
- Human Resources Application
- Through Company Applications
- Through Cargo Shipments
- Through Organizations (Marketing, Training, etc. events)
- From Plaza Information Distribution Point
- From Other Activities
- From Other Units

and processed for the following legal reasons;

Legal Reason	Data Category
Data processing is mandatory for the legitimate interests of the data controller, if it does not harm the fundamental rights and freedoms of the relevant person.	Personnel Information, Location, Communication, Identity, Finance, Visual and Audio Records, Physical Space Security, Legal Procedure Requirement
Data processing is necessary for the establishment, exercise or protection of a right.	Personnel Information, Physical Space Security, Identity, Communication, Finance, Insurance Process, Professional Experience, Customer Transaction, Visual and Audio Records, Location

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Legal Reason	Data Category
It is mandatory for the data controller to fulfil its legal obligations.	Personnel Information, Communication, Identity, Finance, Professional Experience, Physical Space Security, Insurance Transaction,
The processing of personal data of the parties to a contract is necessary, if it is directly related to the establishment or performance of a contract.	Identity, Personnel Information, Finance, Communication, Professional Experience, Visual and Audio Records, Insurance Transactions, Customer Transactions, Physical Space Security
Explicitly stated in the laws (Special Personal data)	Health, Identity, Communication, Professional Experience, Visual and Audio Records, (Periodic examination form, health report, employment declaration)
Employment, occupational health and safety, social security, social services and social assistance (Special Personal data)	Health, Identity, Communication, Professional Experience, Visual and Audio Records, (Periodic examination form, health report, employment declaration)
Data processing is mandatory for the establishment, exercise or protection of a right (Special personal data)	Health
Explicit consent	Visual and Audio Recordings (If you have given consent for taking and sharing photos at events)
Explicit consent (Special personal data)	Data on Criminal Conviction and Criminal Record Document

2. PERSONAL DATA PROCESSING PURPOSES

Your personal data will be processed by the Company for the following purposes within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the “KVKK”:

Processing Purpose	Data Category
Fulfilment of Employment Contract and Legislative Obligations for Employees	Personnel Information, Location, Communication, Identity, Finance, Professional Experience, Visual and Audio Records, Health, Insurance Transactions, Customer Transactions, Criminal Conviction and Criminal Record Document
Execution of Information Security Processes	Personnel Information, Location, Communication, Identity, Visual and Audio Records, Physical Space Security



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Processing Purpose	Data Category
Conducting Employee Benefits and Rights Processes	Personnel Information, Location, Communication, Identity, Professional Experience, Finance, Audio-visual Records, Health, Customer Transactions
Conducting Performance Evaluation Processes	Personnel Information, Location, Communication, Identity, Professional Experience
Conducting Audit / Ethics Activities	Personnel Information, Location, Communication, Identity, Finance
Carrying out activities in accordance with legislation	Personnel Information, Identity, Finance, Communication, Professional Experience, Visual and Audio Records, Health, Insurance Transactions, Legal Transactions, Location, Customer Transactions
Providing Information to Authorized Persons, Institutions and Organizations	Identity, Personnel Information, Communication, Insurance Transactions, Finance, Professional Experience, Health, Legal Transactions, Visual and Audio Records, Location, Criminal Conviction and Criminal Record Document
Conducting Finance and Accounting Affairs	Identity, Personnel Information, Finance, Communication, Insurance Transaction, Customer Transaction
Ensuring the Security of Data Controller Operations	Physical Space Security, Identity, Visual and Audio Records
Ensuring the Security of Movable Goods and Resources	Physical Space Security
Execution of Risk Management Processes	Physical Space Security, Identity, Finance, Communication
Carrying out storage and archive activities	Physical Space Security, Identity, Finance, Personnel Information, Insurance Process, Communication, Professional Experience, Health, Visual and Audio Records, Criminal Conviction and Criminal Record Document
Ensuring Physical Space Security	Physical Space Security, Identity, Professional Experience, Communication, Personnel Information, Visual and Audio Records, Finance, Insurance Process



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Processing Purpose	Data Category
Conducting Occupational Health / Safety Activities	Identity, Professional Experience, Finance, Communication, Personnel Information, Visual and Audio Records, Health, Insurance Process
Management of the Wage Policy	Identity, Personnel Information, Communication, Finance, Insurance Process
Conducting Training Activities	Identity, Professional Experience, Finance, Communication, Personnel Information, Visual and Audio Records, Health, Insurance Process
Execution of Emergency Management Processes	Identity, Professional Experience, Finance, Communication, Personnel Information, Visual and Audio Records, Health, Insurance Process
Monitoring and Execution of Legal Affairs	Identity, Personnel Information, Communication, Finance, Legal Proceedings, Health, Visual and Audio Records, Criminal Conviction and Criminal Record Document
Execution of Access Permissions	Identity, Personnel Information, Communication, Finance, Visual and Audio Records, Physical Space Security
Conducting/Auditing Business Activities	Identity, Personnel Information, Communication, Visual and Audio Records, Physical Space Security, Legal Proceedings, Criminal Conviction and Criminal Record Document
Execution of Contract Processes	Identity, Communication, Personnel Information, Insurance Process, Finance, Professional Experience, Health, Physical Space Security, Criminal Conviction and Criminal Record Document
Conducting insurance transactions	Identity, Communication, Personnel Information, Health, Insurance Transactions, Finance, Professional Experience, Criminal Conviction and Criminal Record Document
Planning of Human Resources Processes	Identity, Professional Experience, Personnel Information, Communication, Visual and Audio Records, Finance
Conducting Assignment Processes	Identity, Professional Experience, Finance, Communication, Personnel Information, Visual and Audio Records
Conduction of Employee Satisfaction and Loyalty Processes	Identity, Professional Experience, Communication



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Processing Purpose	Data Category
Conducting business continuity activities	Identity, Communication, Finance, Personnel Information, Visual and Audio Records, Physical Space Security
Conducting Communication Activities	Identity, Communication, Legal Proceedings, Physical Space Security
Organization and Event Management	Identity, Communication, Audio-visual Records, Professional Experience
Execution of Loyalty Processes to Company	Visual and Audio Records
Execution of Customer Relation Processes	Visual and Audio Records
Processing of Purchasing Activities	Identity, Physical Space Security

3. TO WHOM AND FOR WHAT PURPOSE CAN YOUR PERSONAL DATA BE TRANSFERRED

Your personal data may be transferred to the third parties listed below for the specified purposes, within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the “KVKK”:


3rd Party	Data Category	Transfer Purpose
Authorized Public Institutions and Organizations	Identity, Personnel Information, Communication, Finance, Physical Space Security, Visual and Audio Records, Legal Proceedings, Health	Providing Information to Authorized Persons, Institutions and Organizations, Monitoring and Conducting Legal Affairs, Conducting Activities in Accordance with Legislation
Independent Audit Company	Identity, Personnel Information, Communication, Professional Experience, Visual and Audio Records, Finance, Insurance Transaction, Legal Transaction, Customer Transaction	Conducting and Auditing of Business Activities, Conducting Auditing / Ethics Activities
YMM (Certified Public Accountant CPA), SMM (CPA Freelance Financial Advisor)	Identity, Communication, Finance, Personnel Information, Customer Transaction, Insurance Transaction	Conducting Finance and Accounting Processes
KAP (Public Disclosure Platform)	Identity, Communication, Finance	Providing Information to Authorized Persons, Institutions and Organizations, Execution and Auding of Business Activities



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3rd Party	Data Category	Transfer Purpose
Banks	Identity, Personnel Information, Finance, Communication	Conducting Finance and Accounting Processes
Insurance Company	Identity, Finance, Health, Personnel Information, Communication, Insurance Process, Professional Experience	Conducting Employee Benefits and Rights Processes, Conducting insurance transactions, Conducting activities in accordance with the legislation
Lawyers	Identity, Personnel Information, Communication, Finance, Visual and Audio Records, Legal Proceedings, Health	Monitoring and Conducting Legal Affairs
Occupational Safety and Health Company (OSGB)	Identity, Personnel Information, Communication, Finance, Visual and Audio Records, Health, Professional Experience, Insurance Transaction	Conducting Occupational Safety and Health Processes
Related Customers	Identity, Personnel Information, Communication, Finance, Visual and Audio Records, Professional Experience, Insurance Transaction	Execution of Contract Processes, Execution of Occupational Health and Safety Activities, Execution of Goods / Services Sales Processes
Suppliers (Contracted Vehicle Rental, Vehicle Tracking, Insurance and Fuel Company)	Identity, Communication, Personnel Information, Location, Physical Space Security	Execution and Auding of Business Activities, Execution of Contract Processes, Execution of Business Continuity Activities Conducting Employee Benefits and Rights Processes,
Contracted Cargo Company	Identity, Communication	Conducting Communication Activities
On Public Social Media Accounts	Visual and Audio Records	Execution of Company / Product / Service Loyalty Processes, Organization and Event Management.

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4. YOUR RIGHTS AS A PERSONAL DATA OWNER

Within the scope of Article 11 of the Personal Data Protection Law No. 6698 (“KVKK”), persons whose Personal Data is collected have the right to apply to our Company for the following matters:

- To learn whether their personal data has been processed,
- To request information about their personal data if it has been processed,
- To learn the purpose of processing their personal data and whether it is used in accordance with its purpose,
- To know the third parties to whom their personal data has been transferred domestically or abroad,
- To request correction of their personal data if it has been processed incompletely or incorrectly,
- To request the deletion or destruction of their personal data within the framework of the conditions stipulated in Article 7 of the Law,
- To request that the transactions made pursuant to subparagraphs (d) and (e) of Article 11 of the Law be notified to third parties to whom their personal data has been transferred,
- To object to the emergence of a result against the person by analysing the processed data exclusively through automated systems,
- To request compensation for the damages incurred due to the processing of their personal data in violation of the “KVKK”.

As the relevant Person, you can submit your applications regarding your rights listed above

by filling out the Application Form on our website [VBT Software - Ethical Principles and Policies](#) by using the methods specified in the application form.

Depending on the nature of your request, your applications will be finalized free of charge as soon as possible and within thirty days at the latest; however, if the transaction requires an additional cost, you may be charged a fee according to the tariff determined by the Personal Data Protection Board.