
	SPECIAL PERSONAL DATA PROTECTION POLICY	Document No:	KVK.PL002
		Effective Date:	01.10.2021
		Revision No:	03
		Revision Date:	02.01.2025
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1. PURPOSE AND SCOPE

The purpose of this policy is to inform the relevant persons about the technical and administrative measures taken by our Company regarding the processing, protection and security of special personal data collected by our Company to fulfil its obligations regarding the protection of special personal data.

This policy covers all activities carried out for the processing, protection and security of their special personal data of natural persons who have shared their special personal data with our company for any reason.

2. DEFINITIONS

Presidency/Başkanlık: Presidency of the Personal Data Protection Authority.

Board/Kurul: Personal Data Protection Board.

Institution/Kurum: Personal Data Protection Institution.

Law/KVKK: Law No. 6698 Personal Data Protection.

Information Text: Information statement given to the data subject about the purpose, method of data collection, storing duration, how it is stored and rules of data sharing with third parties.

Inventory: Inventory is the list of personal data processing activities related with the business processes of the Data Controller. The purposes of data collection, processing reasons, categories, storing periods, groups of persons subject of the data, the rules of data sharing with internal and foreign data recipients and the precautions for data security are listed in relation with the Business Processes.

Data Subject: Natural person whose personal data is processed.

Processing: Depending on the Article 3 of KVKK, the process of ensuring personal data availability by means of recording, storing, preserving, changing, rearranging, disclosing, classifying, transferring and taking over.


Personal Data: Any information related to an identified or identifiable natural person. For example; name-surname, citizenship identification number, e-mail, address, date of birth, bank account number, etc.

Processing of Personal Data: Operations like obtaining, recording, storing, preserving, changing, reorganizing, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data, performed on personal data, such as in whole or in part, by automatic or non-automatic means, provided that it is part of any data recording system.

Special Personal Data: Personal data related with race, ethnic origin, religion, sect or other belief, political opinion, philosophical belief, dress code, association, foundation or union membership, health, sexual life, criminal conviction and security measures, biometric and genetic data.

VERBİS: The information system that is used by Data Controllers to apply for registry and perform other registry related transactions; which is created and managed by the Başkanlık/Presidency and accessible via the internet.

Data Controllers Registry: Data Controllers Registry kept by the Presidency/Başkanlık.

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Data Controller: A natural or legal entity who determines the purposes and means of personal data processing and responsible from management of data recording system.

Data Processor: A natural or legal entity who processes personal data on behalf of the data controller based on the authority granted by the data controller

Data Controller Contact Person: The natural person declared by the Data Controller during registration in the Registry, for communication with the Institution/Kurum regarding the obligations of legal entities resident in Turkey or not in Turkey, within the scope of the Law and secondary regulations to be issued based on this Law.

Anonymization: Processing of a personal data in a way that it cannot be associated with a natural person's identity.


Deletion: The process of making personal data inaccessible and non-reusable for the relevant users.

Destruction: The process of destroying relevant users' personal data by rendering it inaccessible, irreversible and non-reusable by anyone.

3. PROCESSING OF SPECIAL PERSONAL DATA

Our Company processes Special Personal Data in accordance with the principles set forth in this policy, by taking all necessary administrative and technical measures, including the minimum-security measures determined or to be determined by the Board/Kurul, and in the presence of at least one of the following conditions:

- The explicit consent of the relevant person,
- In cases clearly stipulated in the laws,
- It is necessary for the protection of the life or physical integrity of the person who is unable to express his/her consent due to a de facto impossibility or whose consent is not recognized as legally valid, or of another person,
- It is related to the personal data made public by the relevant person and is in accordance with the will to make it public,
- It is necessary for the protection of public health, preventive medicine, medical diagnosis, treatment and care services by persons under the obligation of confidentiality or authorized institutions and organizations, and for the planning, management and financing of health services,
- If it is mandatory to fulfil legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance,
- If that data processing is mandatory for the establishment, exercise or protection of a right.
- In accordance with the legislation and purposes to which foundations, associations and other non-profit organizations or formations established for political, philosophical, religious or union purposes, and limited to their fields of activity and It is directed to current or former members or people who are in regular contact with these organizations and formations, provided that it cannot be disclosed to third parties.

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4. PURPOSES OF PROCESSING SPECIAL PERSONAL DATA

Our company processes personal data for similar purposes, but not limited to the following;

Data Category	Special Personal Data	Legal Reasons
Data on Criminal Conviction and Security Measures	Criminal Record Information	Explicit consent (Special Personal data)
Health	Health Report, Disability Data, Health History (previous diseases etc.), Blood Group, Family History (family members health history)	Employment, Occupational Health and Safety, Social Security, Social services and Social assistance (Special Personal data), It is clearly provided for in the laws (Special Personal data), Data processing is mandatory for the establishment, exercise or protection of a right (Special Personal data)

5. ADDITIONAL MEASURES FOR PROCESSING AND PROTECTING SPECIAL PERSONAL DATA


The technical and administrative measures taken by the Company are determined in the “Personal Data Protection Policy” and the “Personal Data Storage and Destruction Policy”. In addition to the technical and administrative measures specified in those policies, the Company also takes the following measures in the processing, security and protection of special personal data.

5.1. Measures for Employees Involved in the Processing of Special Personal Data

- Employees are periodically trained on data security issues such as processing, security, protection, storage, etc. of special personal data with the relevant legislation.
- Confidentiality agreements are made with employees and disciplinary procedures are implemented.
- The access rights employees who can process and see the information of special personal data are defined.
- Authorization checks are carried out periodically.
- Access rights and authorities of employees in this area who change their duties or leave their jobs are immediately revoked. In this context, if any inventory allocated to them is taken back.

5.2. Measures Regarding Electronic Environments Where Special Personal Data Are Processed, Stored and/or Accessed

- Transaction records of actions performed on personal data are securely logged.
- Security updates for environments where personal data is located are continuously monitored, for new updates security tests are performed and test results are recorded. If the results are successful, they are commissioned.
- If data is accessed via application software, user authorizations for this application provided and checked periodically. The security tests for this application software are regularly performed and test results are recorded.
- For remote access to personal data VPN should be used.

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5.3. Measures Regarding Physical Environments Where Special Personal Data Are Processed, Stored and/or Accessed

- Physical environments (cabinet, archive, etc.) where special personal data is located are locked.
- Adequate security measures (against electrical leakage, fire, flood, theft, etc.) are taken according to the nature of the environment where special personal data is located.
- To prevent unauthorized entry and exit to these environments physical security measures are applied.

6. MEASURES REGARDING THE TRANSFER OF SPECIAL PERSONAL DATA

- If data needs to be transferred via e-mail, it is transferred encrypted using a corporate e-mail address or a Registered Electronic Mail (KEP) account. The password information for the file in question is not included in the content of the e-mail.
- Special data is not transferred via portable media such as Memory Stick, CD, DVD.
- If transfer is made between servers in different physical environments, data transfer is carried out by establishing a VPN between the servers or using the SFTP method.
- If data needs to be transferred via paper, necessary precautions are taken against risks such as theft, loss or viewing by unauthorized persons, and the document is sent in the format of “classified documents”.

7. OWNERSHIP AND COMPLIANCE

The Company Data Controller is responsible for the implementation and monitoring of this Policy. If the Policy is updated, the update will enter into force on the date it is approved, and the most up-to-date version of the policy will be published on the company website.