

**ÖZKAN & DÖNMEZ LAW AND CONSULTANCY**  
**Clarification Text on the Processing of Personal Data in Recruitment Processes**

**1. Data Controller**

Your personal data may be transferred to Refik Saydam Cad. Roditi Apt. No:43 K:4 D:5 Beyoğlu, Istanbul by Özkan & Dönmez Law and Consultancy ("**the Bureau**"), as the data controller, within the scope of the provisions of the Law No. 6698 on the Protection of Personal Data ("**LPPD**") and within the framework of this Clarification Text on the Processing of Personal Data within the Scope of Recruitment Processes ("**Clarification Text**").

The Bureau respects your privacy and your rights regarding the protection of your personal data and works to establish and maintain a trust-based relationship with you. In this context, the Bureau processes your personal data in accordance with the provisions of all legislation on the protection of personal data, especially LPPD, ensures that your data is hosted securely and takes all necessary security measures against possible unlawful access. This Clarification Text explains the scope of processing of your personal data collected within the framework of your job application relationship and/or employee candidate reference relationship with the Office.

**2. Methods of Collection of Personal Data**

Your personal data are collected by the Bureau through electronic and/or physical media, fully or partially automated or non-automated means provided that they are part of any data recording system, through the Bureau websites, Bureau entrance, telephone, printed forms (e.g. job application form), interviews, mail / cargo, e-mail, various career portals, human resources companies that professionally mediate for employment, online interview platforms, career offices and public institutions and other methods (channels) that may be added to them in the future.

**3. Categories of Personal Data Processed and Purposes and Legal Reasons for Processing Your Personal Data**

Your personal data categories processed within the scope of the processes of collecting, evaluating and finalizing employee candidate applications, conducting interviews/exams in physical and/or electronic environment and conducting reference checks, and the purposes and legal reasons for the processing of your personal data are explained in detail below.

**\*\*\* Attention Employee Candidates:** *We kindly request that you do not include any personal data of special nature (e.g. association / foundation / union membership) in your CV that you will submit to the Bureau through the above channels.*

| IN TERMS OF PROSPECTIVE EMPLOYEES |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| Personal Data Category            | Purposes of Processing Personal Data and Legal Reasons for Processing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Identity Data</b>              | <p>Your data in this category are processed within the scope of personal data processing conditions (legal reasons) and for the following purposes, provided that it is necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the establishment or performance of a contract in accordance with subparagraph (c) of paragraph 2 of Article 5 of the LPPD, data processing is mandatory for the establishment, exercise or protection of a right in accordance with subparagraph (e), and data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject in accordance with subparagraph (f):</p> <ul style="list-style-type: none"> <li>• Execution of Employee Candidate / Intern / Student Selection and Placement Processes</li> <li>• Execution of Employee Candidate Application Processes</li> <li>• Conducting Audit / Ethics Activities</li> <li>• Monitoring and Execution of Legal Affairs</li> <li>• Conducting Internal Audit / Investigation / Intelligence Activities</li> <li>• Execution of Communication Activities</li> <li>• Planning Human Resources Processes</li> <li>• Execution of Storage and Archive Activities</li> <li>• Providing Information to Authorized Persons, Institutions and Organizations</li> </ul> |
| <b>Contact Data</b>               | <p>Your data in this category are processed within the scope of personal data processing conditions (legal reasons) and for the following purposes, provided that it is necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the establishment or performance of a contract in accordance with subparagraph (c) of paragraph 2 of Article 5 of the LPPD, data processing is mandatory for the establishment, exercise or protection of a right in accordance with subparagraph (e), and data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject in accordance with subparagraph (f):</p> <ul style="list-style-type: none"> <li>• Execution of Employee Candidate / Intern / Student Selection and Placement Processes</li> <li>• Execution of Employee Candidate Application Processes</li> <li>• Conducting Audit / Ethics Activities</li> <li>• Monitoring and Execution of Legal Affairs</li> <li>• Conducting Internal Audit / Investigation / Intelligence Activities</li> <li>• Execution of Communication Activities</li> <li>• Planning Human Resources Processes</li> <li>• Execution of Storage and Archive Activities</li> <li>• Providing Information to Authorized Persons, Institutions and Organizations</li> </ul> |

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| <b>Audio and Visual Data</b>  | <p>Your data in this category are processed within the scope of personal data processing conditions (legal reasons) and for the following purposes, provided that it is necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the establishment or performance of a contract in accordance with subparagraph (c) of paragraph 2 of Article 5 of the LPPD, data processing is mandatory for the establishment, exercise or protection of a right in accordance with subparagraph (e), and data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject in accordance with subparagraph (f):</p> <ul style="list-style-type: none"> <li>• Execution of Employee Candidate / Intern / Student Selection and Placement Processes</li> <li>• Execution of Employee Candidate Application Processes</li> <li>• Conducting Audit / Ethics Activities</li> <li>• Monitoring and Execution of Legal Affairs</li> <li>• Conducting Internal Audit / Investigation / Intelligence Activities</li> <li>• Execution of Communication Activities</li> <li>• Planning Human Resources Processes</li> <li>• Execution of Storage and Archive Activities</li> <li>• Providing Information to Authorized Persons, Institutions and Organizations</li> </ul> |
| <b>Mesleki Deneyim Verisi</b> | <p>Your data in this category are processed within the scope of personal data processing conditions (legal reasons) and for the following purposes, provided that it is necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the establishment or performance of a contract in accordance with subparagraph (c) of paragraph 2 of Article 5 of the LPPD, data processing is mandatory for the establishment, exercise or protection of a right in accordance with subparagraph (e), and data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject in accordance with subparagraph (f):</p> <ul style="list-style-type: none"> <li>• Execution of Employee Candidate / Intern / Student Selection and Placement Processes</li> <li>• Execution of Employee Candidate Application Processes</li> <li>• Conducting Audit / Ethics Activities</li> <li>• Monitoring and Execution of Legal Affairs</li> <li>• Conducting Internal Audit / Investigation / Intelligence Activities</li> <li>• Execution of Communication Activities</li> <li>• Planning Human Resources Processes</li> <li>• Execution of Storage and Archive Activities</li> <li>• Providing Information to Authorized Persons, Institutions and Organizations</li> </ul> |

| <b>IN TERMS OF REFERRER</b>   |                                                                              |
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| <b>Personal Data Category</b> | <b>Purposes of Processing Personal Data and Legal Reasons for Processing</b> |

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| <b>Identity Data</b>                                                                                        | <p>Your data in this category are processed within the scope of the personal data processing condition (legal reason) that data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject in accordance with subparagraph (f) of paragraph 2 of Article 5 of the LPPD and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting Audit / Ethics Activities</li> <li>• Monitoring and Execution of Legal Affairs</li> <li>• Conducting Internal Audit / Investigation / Intelligence Activities</li> <li>• Execution of Communication Activities</li> <li>• Planning Human Resources Processes</li> <li>• Execution of Storage and Archive Activities</li> <li>• Providing Information to Authorized Persons, Institutions and Organizations</li> </ul> |
| <b>Contact Data</b>                                                                                         | <p>Your data in this category are processed within the scope of the personal data processing condition (legal reason) that data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject in accordance with subparagraph (f) of paragraph 2 of Article 5 of the LPPD and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting Audit / Ethics Activities</li> <li>• Monitoring and Execution of Legal Affairs</li> <li>• Conducting Internal Audit / Investigation / Intelligence Activities</li> <li>• Execution of Communication Activities</li> <li>• Planning Human Resources Processes</li> <li>• Execution of Storage and Archive Activities</li> <li>• Providing Information to Authorized Persons, Institutions and Organizations</li> </ul> |
| <b>Professional Experience Data</b><br><i>(limited to the institution, title, duty and position worked)</i> | <p>Your data in this category are processed within the scope of the personal data processing condition (legal reason) that data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject in accordance with subparagraph (f) of paragraph 2 of Article 5 of the LPPD and for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting Audit / Ethics Activities</li> <li>• Monitoring and Execution of Legal Affairs</li> <li>• Conducting Internal Audit / Investigation / Intelligence Activities</li> <li>• Execution of Communication Activities</li> <li>• Planning Human Resources Processes</li> <li>• Execution of Storage and Archive Activities</li> <li>• Providing Information to Authorized Persons, Institutions and Organizations</li> </ul> |

#### **4. Transfer of Your Personal Data to Third Parties Residing in Turkey and/or Abroad**

Within the Bureau, your personal data can only be accessed to the extent necessary to fulfill their duties by our employees who have limited authorization access for the purposes detailed above and are not transferred to third parties residing in Turkey and/or abroad in the absence of the conditions

for transfer regulated in Articles 8 and 9 of the LPPD. However, your personal data processed within the scope of each personal data category mentioned above may be transferred to the following recipient groups in accordance with Articles 8 and 9 of the LPPD and if the personal data processing conditions (legal reasons) specified above for the relevant data category are also available for the purposes of transfer:

- Your personal data limited to the categories of identity, communication, professional experience and visual and auditory personal data, especially for the purpose of providing products and/or services, to our domestic and/or foreign **suppliers** (*e.g. information technologies and data hosting service providers*) for the purposes specified in the relevant category for each data category above,
- Your personal data limited to the personal data categories of identity and professional experience, in particular for the purpose of conducting a reference check, to the persons you have explicitly communicated and approved to the Bureau **as a resident reference for the purposes specified in the relevant category for each data category above**, and
- Your personal data limited to the categories of identity, communication, professional experience and visual and audio personal data, especially for the purposes of fulfilling the legal obligations of the Bureau and the follow-up of legal affairs, **to the authorized public institutions and organizations** located in the country for the purposes specified in the relevant category for each data category above.

## **5. Duration of Processing Your Personal Data**

Your personal data obtained during our Bureau activities are stored and destroyed in accordance with the general principles and regulations specified in the Bureau's policies and procedures on storage and destruction, which are prepared in accordance with the provisions of the Constitution, the LPPD, the Regulation on Deletion, Destruction or Anonymization of Personal Data and other relevant legislation.

In this context, your personal data will be destroyed in the event that all of the above-mentioned personal data processing conditions disappear. In case you are employed, your personal data that you have shared within the scope of your job application will continue to be processed during the employment contract and subsequent legal time-out periods; If you are not employed, it is destroyed in the first destruction period with the closure of the trial period of the position. In terms of your requests regarding the destruction of your personal data, we kindly ask you to review section 6 of this Clarification Text.

## **6. Your Rights under the LPPD**

As a personal data owner, we inform you that you have the following rights pursuant to Article 11 of the LPPD:

- Learn whether your personal data is being processed,
- Request information if your personal data has been processed,
- To learn the purpose of processing your personal data and whether they are used in accordance with their purpose,
- To know the third parties to whom your personal data is transferred domestically or abroad,
- To request correction of your personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom your personal data has been transferred,
- Although it has been processed in accordance with the provisions of the LPPD and other relevant laws, to request the deletion or destruction of your personal data in the event that the reasons requiring its processing disappear, and to request notification of the transactions made within this

scope and in case your personal data is incomplete or incorrectly processed to third parties to whom your personal data has been transferred,

- To object to the emergence of a result to the detriment of the person himself/herself by analyzing your processed data exclusively through automated systems,
- In case of damage due to unlawful processing of your personal data, to demand the compensation of the damage.

You may submit your applications for your rights mentioned above in accordance with the provisions of the Communiqué on the Procedures and Principles of Application to the Data Controller (in writing, secure electronic signature, mobile signature or electronically via your e-mail address that you have previously notified to the Bureau and registered in our systems, together with information/documents\* (T. C. identification number or passport number for citizens of other countries, residential address/workplace address for notification, mobile phone/telephone/fax number, e-mail address, etc.) to the data controller, the Bureau. Depending on the nature of your request, your applications will be finalized free of charge as soon as possible and within 30 (thirty) days at the latest; however, if the transaction requires an additional cost, you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board.

\* We would like to remind you that no special categories of personal data (e.g. religious information or blood type information) should be included within the scope of these documents.